California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration

Tentative Tract No. 20723
Palmdale Road and Calendula Street Residential Project

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

Project Proponent
Core Group Consultants, LTD
17594 W Agave Court
Goodyear, AZ 85338

Prepared By
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March 3, 2025

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1.0 Background Information

PROJECT TITLE	**PALMDALE ROAD AND CALENDULA ROAD RESIDENTIAL PROJECT TENTATIVE TRACT MAP (TTM) NO. 20273**
LEAD AGENCY	City of Adelanto Development Services-Planning Division 11600 Air Expressway, Adelanto CA 92301 Christian Espinoza, Planning Technician Phone: (760) 246-2300 Email: cespinoza@adelantoca.gov
PROJECT LOCATION	130 feet +/- west of Hampton Lane, and 330 feet +/- south of Seneca Road. Assessor's Parcel Numbers: 3103-361-05 and 3103-361-06
PROJECT DESCRIPTION	Subdivide two contiguous properties totaling approximately 10 gross acres into 48 single-family residential lots with a minimum lot size of 6,050 square feet and an average lot size of 7,241 square feet.
GENERAL PLAN AND ZONING	Single-Family Residential (RS-5)
PROJECT PROPONENT	Core Group Consultants, LTD 17594 W Agave Court Goodyear, AZ 85338 % Beau Cooper United Engineering Group 10601 Church Street, Ste 124. Rancho Cucamonga, CA 91730 O: 909.466.9240 x 203 | M: 909.292.6677 bcooper@unitedeng.com |
CEQA CONSULTANT	EPC Environmental Inc. 11801 Pierce Street, Ste. 200 Riverside, CA 92505 Ph. 951-310-3010 Email: ernest@ceqa.plus
DATE OF PREPARATION	March 5, 2025

Significant or Potentially Significant Environmental Factors

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

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

Determination

Based on this initial evaluation:

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

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

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

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

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

Signature	City of Adelanto **Lead Agency**
Christian Espinoza, Planning Technician **Printed Name/Title**	March 3, 2025 **Date**

2.0 Introduction

2.1 Purpose of the Initial Study/Mitigated Negative Declaration

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

- **Negative Declaration**: If the initial study concludes that the project will not cause a significant effect on the environment, the City can prepare a Negative Declaration. (Public Resources Code §21080(c); CEQA Guidelines §15070 et seq. (negative declaration process).) A Negative Declaration is a written statement that an EIR is not required because a project will not have a significant adverse impact on the environment. (Public Resources Code §§21064, 21080(c).)
- **Mitigated Negative Declaration**: The City may attach conditions to a Negative Declaration for the purpose of mitigating potential environmental effects. This is referred to as a "Mitigated Negative Declaration." (Guidelines §15070(b); Public Resources Code §21064.5.) A Mitigated Negative Declaration states that revisions in the project made or agreed to by the applicant would avoid the potentially significant adverse impacts, and that there is no substantial evidence that the revised project will have a significant effect on the environment. (Public Resources Code §21064.5; Guidelines §15070(b).
- **Environmental Impact Report**: If the Initial Study determines that there are potentially significant physical effects on the environment that cannot be mitigated to a less than significant level, the City will prepare an Environmental Impact Report. Environmental Impact Reports are reports to inform the public and City decision-makers of significant environmental effects of proposed projects, identify possible ways to minimize those effects, and describe reasonable alternatives to those projects.

Based on the Initial Study prepared for the Project, it is recommended that a **Mitigated Negative Declaration** be adopted.

2.2 Environmental Impacts Requiring Mitigation

Table 2-1 lists all the Mitigation Measures contained in this IS/MND document.

Table 2.1: Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures (MM)
4.4 (a) Biological Resources Construction will impact species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	**MM BIO-1: Pre-Construction Sensitive Plant Clearance Survey.** Prior to Project implementation, and during the appropriate season, a qualified biologist shall conduct botanical field surveys within the Project area following protocols set forth in the California Department of Fish and Wildlife's (CDFW) 2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special-status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any special-status plants are identified, the Project Applicant shall avoid the plant(s), with an appropriate buffer (i.e., fencing or flagging). If complete avoidance is not feasible, the Project Applicant shall mitigate the loss of the plant(s) through the purchase of mitigation credits from a CDFW-approved bank and/or land acquisition and conservation at a mitigation ratio determined by CDFW after Project analysis. If the Project has the potential to impact a state-listed species, the Project Applicant should apply for a California Endangered Species Act (CESA) Incidental Take Permit (ITP) with CDFW.
	MM BIO-2: Western Joshua Tree Incidental Take Permit. The western Joshua tree is a candidate threatened species under the California Endangered Species Act. If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) under Section §2081b of the California Endangered Species Act (CESA), or under the Western Joshua Tree Conservation Act (Fish & Game Code, §§1927-1927.12), prior to the relocation, removal, or take. (California Fish and Game Code Section 86 defines "take" as

Environmental Impact	Mitigation Measures (MM)
	"hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§2080 & 2085 and §§1927-1927.12). Mitigation for CESA will occur at a minimum 1:1 or per the stem count per the WJTCA census in lieu fee. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Adelanto falls within an area of the WJTCA that qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). Mitigations fees are updated annually. For the current fees, please visit: Western Joshua Tree Conservation Act Incidental Take Permit. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.
	MM BIO-3: Burrowing Owl Pre-Construction Survey. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a "take avoidance survey" should be conducted by a qualified Biologist for the project site and surrounding 500 ft radius utilizing the methodology provided in CDFW's 2012 Staff Report on Burrowing Owl Mitigation. This survey should be conducted no more than 14 days prior to initiation of ground disturbance activities. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. Should no Burrowing Owls be detected during the initial "take avoidance survey", the survey

Environmental Impact	Mitigation Measures (MM)
	should be repeated within 24 hours prior to ground disturbance to determine if the Project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the Project site. If both surveys reveal no burrowing owls, active burrowing owl burrows or perch sites with active sign (molted feathers, cast pellets, prey remains, eggshell fragments, decoration, or excrement) thereof, no additional actions related to this measure are required and a report shall be prepared by the qualified biologist documenting the results of the survey including all requirement for survey reports (page 30 of the 2012 Staff Report). The report shall be submitted to CDFW for review prior to construction. If burrowing owl, active burrows or signs thereof are found the qualified biologist shall prepare and implement a plan for avoidance, minimization, and mitigation measures to be review and approved by CDFW for review and approval at least 30 days prior to initiation of ground disturbing activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. Project activities shall not occur within 1000 feet of an active burrow until CDFW approves the Burrowing Owl Plan. If the Project cannot ensure burrowing owls and their burrows are fully avoided, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to potentially acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081 subdivision (b). Full mitigation often involves the permanent conservation of quality habitat benefiting the species through a conservation easement, along with habitat enhancement and ongoing management funded appropriately. Passive relocation, performed according to the Staff Report on Burrowing Owl Mitigation (CDGW, 2012) may be authorized through the incidental take permit as a minimization measure.
	MM BIO-4: Nesting Bird Survey. Regardless of the time of year, a pre-construction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of Project activities, including, but

Environmental Impact	Mitigation Measures (MM)
	not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.
	MM BIO-5: Desert Tortoise Pre-Construction Survey. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). This would consist of one complete (100% coverage) protocol level presence or absence survey of the Project area and 500-foot buffer of suitable habitat prior to the initiation of construction at any time of year. The survey should be conducted no more than 48 hours prior to construction beginning and after any pause in Project activities lasting 30 days or more, in accordance with the USFWS 2009 desert tortoise survey methodology by a CDFW Approved Biologist. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to the start of Project activities. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If desert tortoise is found on the project site during preconstruction surveys,

Environmental Impact	Mitigation Measures (MM)
	construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise shall only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. The Project proponent shall not undertake Project activities and Project activities shall be postponed until appropriate authorization [i.e., California Endanger Species Act (CESA) Incidental Take Permit under Fish and Game Code section 2081] is obtained. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a Desert Tortoise Translocation Plan (DTTP) to be administered during the construction and operation of the project. The DTTP should be submitted to the City of Adelanto for review and approval and shall be updated and utilized for translocation and monitoring after construction. The DTTP should include but not be limited to the following: 1. Discussion on temporary construction fencing (if any), 2. Description of clearance surveys of permanent exclusion areas, 3. Transportation and release procedures, 4. Construction Schedule, 5. Translocation/relocation areas, 6. Monitoring and reporting.
	MM BIO-6: Pre-Construction Mohave Ground Squirrel Survey. Prior to the initiation of ground disturbing activities, focused pre-construction clearance surveys throughout the Project site for Mohave ground squirrel will be conducted by a qualified biologist familiar with the species' behavior and life history. Focused Mohave ground squirrel surveys shall follow the California Department of Fish and Game Mohave Ground Squirrel Survey Guidelines (CDFW 2023). Visual surveys will be conducted prior to ground disturbing activities commencing between March 15 and April 15, visual surveys shall be conducted on the Project site during daylight hours by a qualified biologist who can readily identify Mohave ground squirrel *(Xerospermophilus mohavensis)* and white-tailed antelope squirrel *(Ammospermophilus leucurus)*. If the results of the survey confirm absence, then the Qualified Biologist shall ensure Mojave ground squirrels do not enter the Project site. If the survey or monitoring throughout the duration of the Project confirms presence, the Project proponent shall obtain an Incidental Take Permit (ITP) for Mohave ground squirrel. The ITP will specify avoidance, minimization, and mitigation conditions for temporary and/or permanent impacts to Mohave ground squirrel including habitat acquisition at a CDFW approved location and mitigation ratio.
	MM BIO-7: Crotch's Bumble Bee Habitat Assessment. Prior to vegetation removal and/or grading, a Designated Biologist shall conduct a habitat assessment to determine whether Crotch's

Environmental Impact	Mitigation Measures (MM)
	bumble bee habitat is present or absent in the Project site and adjoining area. The habitat assessment shall be performed according to the 2023 CDFW Survey Considerations for CESA Candidate Bumble Bees.pdf. If habitat for Crotch's bumble bee is present, a Designated Biologist shall conduct focused surveys prior to vegetation removal and/or grading for the presence/absence of Crotch's bumble bee. Survey methodology shall follow the 2023 CDFW Survey Considerations for Candidate Bumble Bee. Surveys shall be conducted during the flying season when the species is most likely to be detected above ground, between March 1 to September 1, by an approved Designated Biologist familiar with Crotch's bumble bee behavior and life history. Surveys shall be conducted within the Project site and areas adjacent to the Project site where suitable habitat exists. Survey results including negative findings shall be submitted to CDFW at least 30 days prior to Project-related vegetation removal and/or ground-disturbing activities. If the species is identified on site, Project Proponent shall fully avoid the species absent take authorization. If the Project may result in take of Crotch's bumble bee through either nest destruction or destruction of potential nests hidden in bunch grasses or other nesting habitat, or if complete avoidance of Crotch's bumble bee cannot be achieved, Project activities shall be postponed until appropriate authorization (i.e., a finalized CESA ITP under Fish and Game Code §2081) is obtained.
4.4 (d) Biological Resources Construction will conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Covered by **MM BIO-1. Western Joshua Tree Incidental Take Permit.**
4.5 (b) Cultural Resources Subsurface archaeological resources may be encountered during ground disturbance.	**MM CR-1: Cultural Resources Discovery.** Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If 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 discovery. Work on the other portions of the Project outside the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial

Environmental Impact	Mitigation Measures (MM)
	assessment of the nature of the discovery, to provide Tribal input with regards to significance and treatment.
	MM CR-2: Monitoring and Treatment Plan. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly."
4.7 (f) Geology and Soils Subsurface paleontological resources may be encountered during ground disturbance.	**MM PALEO-1: Inadvertent Discovery of Paleontological Resources.** If paleontological resources are encountered during implementation of the Project (including areas impacted by off-site street improvements), ground-disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist shall be retained by the developer to make an evaluation of the find. If the resource is significant, Mitigation Measure PALEO-2 shall apply.
	MM PALEO-2: Paleontological Treatment Plan. If a significant paleontological resource(s) is discovered on the property (including areas impacted by off-site street improvements), in consultation with the Project proponent and the City, the qualified paleontologist shall develop a plan of mitigation that shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.
4.18 (b) Tribal Cultural Resources Su-surface tribal cultural resources may be encountered during ground disturbance.	**MM TCR-1: Contact Yuhaaviatam of San Manuel Nation.** The Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regard to significance and treatment. If the find is 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, if YSMN elects to place a monitor on-site.

Environmental Impact	Mitigation Measures (MM)
	MM TCR-2: Tribal Cultural Documents. Any and all archaeological/cultural documents created as a part of the project (e.g., isolate records, site records, survey reports, testing reports) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the Project. Note: Yuhaaviatam of San Manuel Nation realizes that there may be additional tribes claiming cultural affiliation to the area; however, Yuhaaviatam of San Manuel Nation can only speak for itself. The Tribe has no objection if the agency, developer, and/or archaeologist wishes to consult with other tribes in addition to YSMN and if the Lead Agency wishes to revise the conditions to recognize additional tribes.
4.19 (a) Utilities and Service Systems Construction/installation of utilities and service systems will impact Biological Resources, Cultural Resources, Paleonto-logical Resources, and Tribal Cultural Resources.	**MM BIO-1** through **MM BIO-7, MM CR-1** through **MM CR-2, MM PALEO-1**, **MM PALEO-2,** and **MM TCR -1** through **MM TCR-2** described above are required.

3.0 Project Description/Environmental Setting

3.1 Project Location

The Project site consists of approximately 10 gross acres with Seneca Road to the north, Calendula Road to the east, Palmdale Road to the south, and vacant land to the west. The Project site is identified by the following Assessor's Parcel Numbers: 3103-361-05 and 3103-361-06 (see Figure 3.1 – Project Site Location/Aerial.

3.2 Project Description

Use the Family Residential (R-S5) zoning to subdivide approximately 10 gross acres into 48 single family residential lots with a minimum lot size of 6,009 square feet and an average lot size of 7,228 square feet.

3.3 Proposed Improvements

Development of the Project will impact approximately 10 acres of undeveloped land, currently covered with desert scrub vegetation, into a residential housing community consisting of 48 lots (see Figure 3.2 – Lot Layout). Project activities include site preparation (ground clearing and removal of all vegetation); grading of the entire Project site and installation of building footings, utility lines, and underground infrastructure, construction (construction of new houses), paving, landscaping, and finishing (paving of streets, installation of perimeter fencing, installation of landscaping, and finishing of the homes).

Street Improvements and Access

The Project will take access from the new public streets being constructed that will connect to Hampton Lane adjacent to the eastern boundary of the Project Site.

Water and Sewer Improvements

Water Service

The Project will connect to the existing 8-inch diameter waterline located to the east of the properties. The lines will be connected to existing services extending from Tract No. 20401 located adjacent to the Project site.

Sewer Service

The Project will connect to the existing 8-inch diameter sewer line to the east extending from Tract No. 20401 adjacent to the Project site.

Figure 3.1 – Project Site Location/Aerial

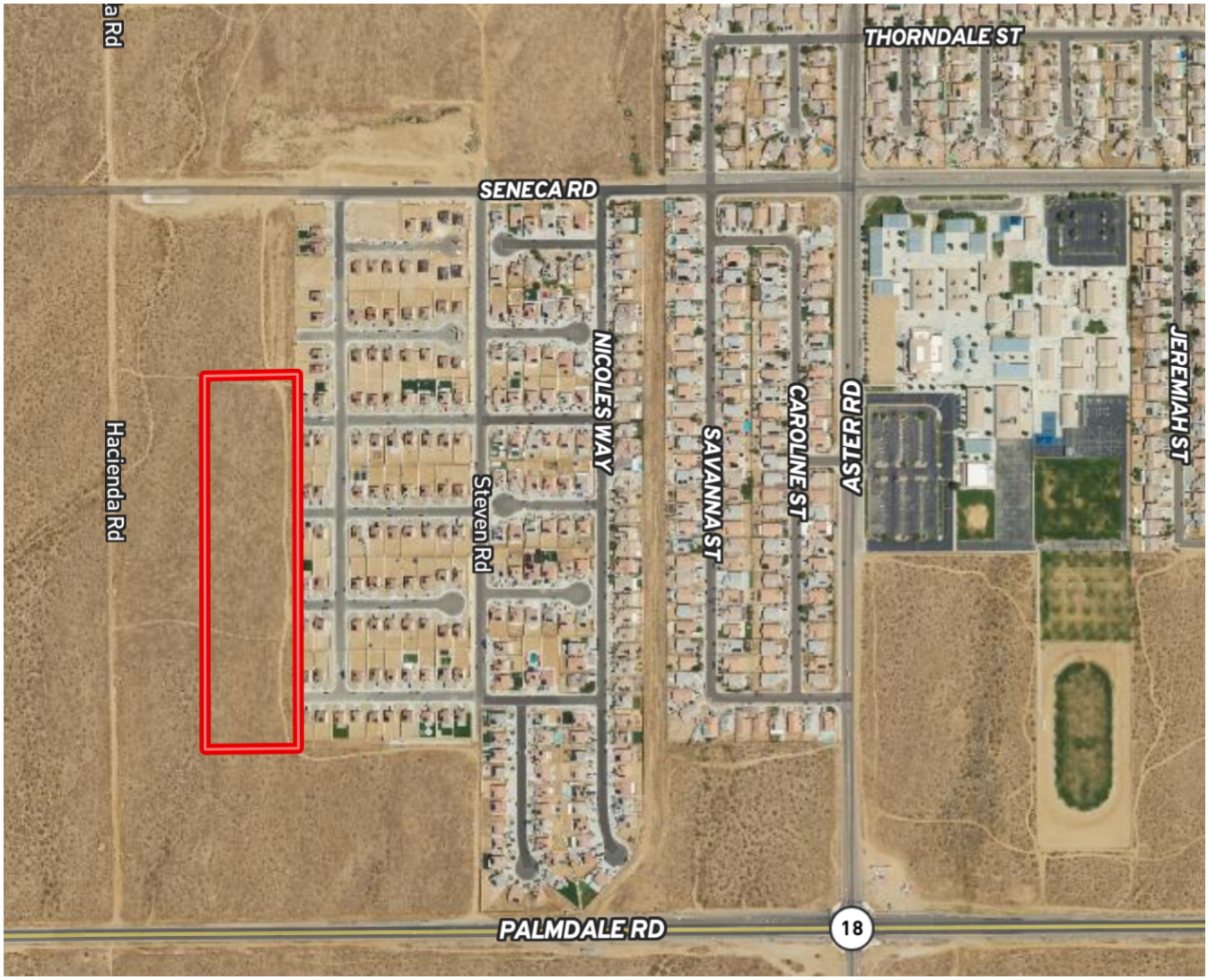
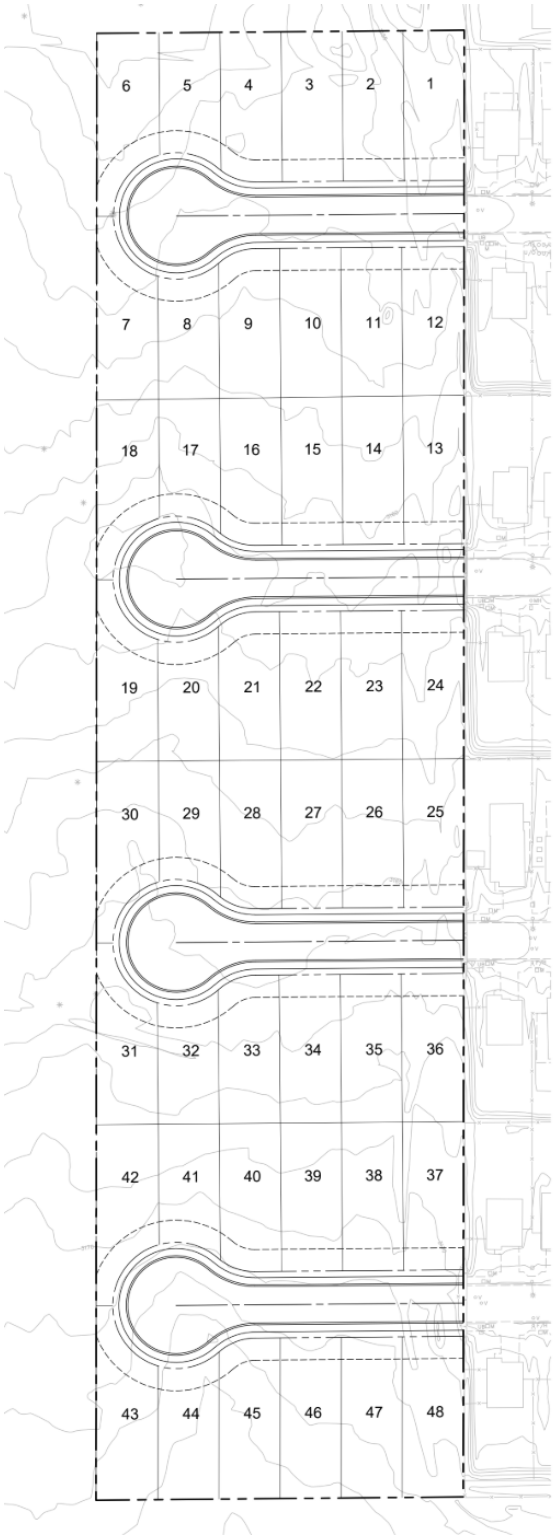


Figure 3.2 – Lot Layout



Storm Drainage Improvements

The proposed condition is to utilize a 24" and 36" storm drain connecting to the adjacent Tract No 20401 and Lot A, the 1.29-acre foot capacity basin located at the north end of the Project Site for drainage. The design will incorporate controlled basin outlets; as depicted in Figure 3.2– Lot Layout. The site run-off has been routed to the basin using the streets and typical surface collection facilities for water quality and flood control.

To accommodate the above-described improvements, an off-site grading and drainage easement is required. The drainage easement area is on the east side of the project site. (Refer to Tentative Tract Map No. 20401).

3.4 Construction and Operational Characteristics

Construction Schedule

Houses will be constructed based on market demand and absorption. Construction of the Project is anticipated to begin in the year 2026 and last approximately 13 months. Construction phases are assumed to consist of site preparation, grading, building construction, paving and architectural coating. Construction equipment and staging are to occur onsite, and construction vehicle access is available from the north, west, and south of the property.

Operational Characteristics

The proposed Project would operate as a residential community. Typical operational characteristics would include residents and visitors traveling to and from the site, leisure and maintenance activities occurring on individual residential lots, and the on-site recreational facilities and general maintenance of common areas. Low levels of noise and a moderate level of artificial exterior lighting typical of a residential community are expected.

3.5 Environmental Setting

CEQA Guidelines §15125 establishes requirements for defining the environmental setting to which the environmental effects of a proposed project must be compared. The environmental setting is defined as "…the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or if no Notice of Preparation is published, at the time the environmental analysis is commenced…" (CEQA Guidelines §15125[a]). Because a Notice of Preparation was not required, the environmental setting for the Project is October 2024, which is the date that the Project's environmental analysis commenced. Onsite and adjacent land uses, General Plan land use designations, and zoning classifications are shown in Table 3.1.

Table 3.1: Land Uses, General Plan Land Use Designations, and Zoning Classifications

Location	Current Land Use	General Plan Land Use/Zoning Designations
Site	Vacant land	Single Family Residential (R-S5)
North	Vacant land	Single Family Residential (R-S5)
South	Vacant land	General Commercial (C)
East	SR-5 Residential Homes	Single Family Residential (R-S5)
West	Vacant land	Single Family Residential (R-S5)

Source: Field inspection, City of Adelanto - General Plan Land Use & Zoning District Map, November 2024, Google Earth Pro.

4.0 Environmental Analysis

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

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

4.1 Aesthetics

Threshold 4.1 Would the Project (except as provided in Public Resources Code §21099)	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			✓	

Threshold 4.1 (a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact

A scenic vista is defined as a publicly accessible vantage point that provides expansive views of a highly valued landscape. The City of Adelanto General Plan identifies scenic vistas within the City.[1] Landforms or features that constitute a scenic vista in Adelanto include the Shadow Hills, located approximately six (7) miles to the north of the Project site, and the Mojave River, located approximately eight (8) miles east of the Project site. Impacts on scenic vistas are analyzed from points or corridors that are accessible to the public and that provide a view of a scenic vista. Potential public views and vantage points from the Project site to the Shadow Hills and Mojave River would be from the public-rights-of-way of Senneca Road, and the internal public streets serving the Project.

Structures within a viewer's line of sight of a scenic vista may interfere with a public view of a scenic vista, either by physically blocking or screening the scenic vista from view, or by impeding or blocking access to a formerly available viewing position. Those viewers may see the scenic areas prior to development; but would have those views blocked post development. Because of the distance to the Shadow Hills and Mojave River and intervening development, public views of these scenic vistas would not be blocked by the Project.

1 City of Adelanto General Plan, Chapter 7, Conservation and Open Space Element.

In addition, as required by Adelanto Zoning Ordinance §17.20.030, Table 20-1, the residential structures proposed of the property are restricted to 48, the maximum lot coverage is 40%, and there are required building setbacks for the front, rear, and side lot lines which will serve to create space between structures. As such, the proposed structures would not block or completely obstruct views from surrounding public vantage to the Shadow Hills. The Mojave River is not visible from the Project Site because of the flat topography and because it is eight (8) miles east. Impacts are less than significant, and no mitigation measures are required.

Threshold 4.1 (b): Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact

According to the California Department of Transportation, the Project site is not located within a State scenic highway.[2] *As such, there is no impact.*

Threshold 4.1 c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact

According to the U.S. Census Bureau, Adelanto is located within the Victorville-Hesperia, CA Urbanized Area.[3] As such, the Project subject to the City's applicable regulations governing scenic quality.[4] After recordation of the Final Tentative Tract Map, single family residences can be constructed at a future date. The Community Design Element of the General Plan sets forth the characteristics that should be incorporated into the design of single family detached residential housing units. General Plan Section H.2, *Design Regulation and Review*, requires development plans (which include architectural design, site plans, and landscaping) be reviewed and evaluated to determine compliance with the objectives and specific requirements of the General Plan *Community Design Element* and Title 17, *Adelanto Zoning Ordinance*.

As required by §17.15.040, *Single-Family Residential Design Standards* of the Zoning Ordinance, construction of the proposed single family detached residential housing units are required to demonstrate compliance with the following salient regulations governing scenic quality:

2 California Department of Transportation, State Scenic Highway Program, https://dot.ca.gov/programs/design/lap-landscape- architecture-and-community-livability/lap-liv-i-scenic-highways, accessed October 31, 2024.
3 United States Census Bureau, 2010 Census Urban Area Reference Maps, https://www2.census.gov/geo/maps/urbanarea/uaoutline/UA2000/ua90541/ua90541_01.pdf, Accessed November 4, 2024.
4 City of Adelanto General Plan, page XI-4.

- Site Character - Existing natural amenities (views, mature trees, and/or topographic features) and other amenities (structures of architectural significance and cultural resources) unique to the site shall be preserved and incorporated into the project's design whenever possible.
- Variation of Development Patterns - Variation of development patterns shall be incorporated into new subdivisions to achieve visual diversity and avoid a monotonous appearance.
- Landscaping - A residential subdivision's landscaping shall be used to frame, soften, and embellish the quality of the residential environment, to buffer units from noise or undesirable views,
- Walls/Fences - Walls shall be designed to complement the architectural design of the homes within the neighborhood.
- Architectural Standards - Residential structures should consider compatibility with surrounding character, including building style, form, size, color, material, and roof line.

Mandatory compliance with the above-described provisions of the General Plan and Zoning Ordinance ensures that the Project will not conflict with regulations governing scenic quality.

Threshold 4.1 (d): Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact

Outdoor Lighting and Glare

The Project would increase the amount of light in the area above what is being generated by the vacant site by directly adding new sources of illumination including security and decorative lighting for the proposed structures. All outdoor lighting is required to be designed and installed to comply with §17.90.040- *Lighting,* of the Zoning Ordinance[5] which stipulates:

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

Building Material Glare

Section 17.20.040 (b) of the Zoning Ordinance requires siding material to consist of stucco, wood, brick, stone, or decorative concrete block which are non-reflective materials which do not result in glare. Windows in single family residential housing units are not of the size and scale where a large expanse of glass surface area will produce glare. In addition, single family homes typically have window coverings (e.g., shades, blinds) that reduce impacts from interior and exterior

glare. Compliance with the above referenced Zoning Ordinance requirements will ensure that the Project will not adversely affect day or nighttime views in the area.

4.2 Agriculture and Forestry Resources

Threshold 4.2 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

Threshold 4.2 a): Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program.[5] As such, development of the Project will not convert any type of farmland to a non-agricultural use.

5 https://maps.conservation.ca.gov/DLRP/CIFF/, Accessed on November 2, 2024.

Threshold 4.2 b): Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact

Agricultural Zoning

The current zoning is Single Family Residential (R-S5). The R-S5 zone district is intended for the development of single-family detached housing at a density of up to five units per gross acre. Minimum lot size is 5,000 square feet. Development at this density requires full urban levels of service and public improvements. The R-S5 zone is not intended for agricultural use. Therefore, the Project would not conflict with existing zoning for agricultural use.

Williamson Act

A Williamson Act contract enables private landowners to voluntarily enter contracts with local governments for the purpose of establishing agricultural preserves. The Project site is not under a Williamson Act contract.[6]

Threshold 4.2 c): Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact

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

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

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

6 https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html, accessed November 3, 2024.

Threshold 4.2 d): Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

As noted in the response to Threshold 4.2(c) above, the Project site and surrounding properties do not contain forest lands, are not zoned for forest lands, nor are they identified as containing forest resources by the General Plan. Because forest land is not present within the Project site or in the immediate vicinity of the site, the Project has no potential to result in the loss of forest land or the conversion of forest land to non-forest use.

Threshold 4.2 e): Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact

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

4.3 Air Quality

The following analysis is based in part on the following:

- California Emission Estimator Model (CalEEMod) Summary Report, included as Appendix A to this Initial Study.
- MDAQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, February 2020, available at: https://www.mdaqmd.ca.gov/rules/overview.

Threshold 4.3 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?			✓	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentra-tions?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

Air Quality Setting

Topography and Climate

The Project site is located within the Mojave Desert portion of the Mojave Desert Air Basin (MDAB). It is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriel's by the Cajon Pass (4,200 feet). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley). The MDAB is classified as a dry-hot desert (BWh), with portions classified as dry-very hot desert (BWhh), to indicate that at least 3 months have maximum average temperatures over 100.4° F.[7]

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

Air Pollutants and Health Effects

Air pollutants are the amounts of foreign and/or natural substances occurring in the atmosphere that may result in adverse effects on humans, animals, vegetation and/or materials. The Air pollutants regulated by the MDAQMD that are applicable to the Project are described below.[8]

Carbon Monoxide (CO). A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. Carbon monoxide is harmful when breathed because it displaces oxygen in the blood and deprives the heart, brain, and other vital organs of oxygen.

Nitrogen Dioxide NOx). Nitrogen dioxide (NO2) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO2, creating a mixture of NO and NO2 commonly called NOx. NOx can irritate the eyes, nose, throat, and lungs, possibly leading to coughing, shortness of breath, tiredness, and nausea.

Particulate Matter (PM2.5 and PM10): One type of particulate matter is the soot seen in vehicle exhaust. Fine particles – less than one-tenth the diameter of a human hair – pose a serious threat to human health, as they can penetrate deep into the lungs. PM can be a primary pollutant or a secondary pollutant from hydrocarbons, nitrogen oxides, and sulfur dioxides. Diesel exhaust is a major contributor to PM pollution.

Sulfur Dioxide (SO2). A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO2. Sulfur dioxide irritates the skin and mucous membranes of the eyes, nose, throat, and lungs.

Ozone: Ozone is formed when several gaseous pollutants react in the presence of sunlight. Most of these gases are emitted from vehicle tailpipe emissions. Ozone can reduce lung function worsening bronchitis, emphysema, and asthma.

Volatile Organic Compounds (VOCs): VOCs contribute to the formation of smog and/or may themselves be toxic. VOCs often have an odor, and some examples include gasoline, alcohol and the solvents used in paints. Health effects may include eye, nose and throat irritation, headaches, loss of coordination, and nausea.

Non-Attainment Designations and Classification Status

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

8 http://www.aqmd.gov/home/air-quality

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

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	No Standard
Ozone – 8-hour standard	Nonattainment	Nonattainment
Respirable Particulate Matter (PM10)	Nonattainment	Attainment
Fine Particulate Matter (PM2.5)	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (N0x)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO2)	Unclassified /Attainment	Unclassified/Attainment
Lead	Attainment	Attainment

Source: California Air Resources Board, 2015.

As shown in Table 4.3-1 above, the MDAB is classified as Nonattainment for Ozone – 1-hour standard, Ozone – 8-hour standard, Respirable Particulate Matter (PM10) and Fine Particulate Matter (PM2.5)

Threshold 4.3 a): Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact

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

Conformity with Air Quality Management Plans

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

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

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

the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

Consistency with Emission Thresholds

As shown in Table 4.3.2 below, the Project would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or during long-term operation. Accordingly, the Project's air quality emissions are less than significant.

Consistency with Control Measures

The construction contractors are required to comply with rules, regulations, and control measures to control fugitive dust from grading (Rule 403) and the application of architectural coatings during building construction (Rule 1113).

Consistency with Growth Forecasts

The Project site is currently designated as Single Family Residential (R-S5) by the General Plan Land Use & Zoning Map. The proposed R-S5 zone district is intended for the development of single-family detached housing at a density of up to 5 units per gross acre. The proposed Project would develop a total of 48 homes on a 10.05-acre parcel for a total density of 4.4 homes per acre. As such, the proposed Project would not substantially change the growth assumptions used in the MDAQMD plans.

Threshold 4.3 b): Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact

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

Table 4.3.2: MDAQMD Air Quality Significance Thresholds

Pollutant	Daily Emissions (pounds/day)
Carbon Monoxide (CO)	548
Oxides of Nitrogen (NOx)	137
Volatile Organic Compounds (VOC)	137
Oxides of Sulphur (SOx)	137
Particulate Matter (PM10)	82
Particulate Matter (PM 2.5)	65

Source: MDAQMD CEQA Guidelines, February 2020, Table 6.

Both construction and operational emissions for the Project were estimated based on a worst-case scenario of 48 dwelling units by using the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model is authorized for use by the Mojave Desert Air Quality Management District.

Construction Emissions

Construction of the Project is assumed to begin in the year 2026 and last approximately 13 months. Construction phases are assumed to consist of site preparation, grading, building construction, paving, and architectural coating. The Project is expected to be operational in the year 2027. Construction phases are not expected to overlap. Construction activities produce combustion emissions from various sources (e.g., utility engines, tenant improvements, and motor vehicles transporting the construction crew). Exhaust emissions from construction activities envisioned onsite would vary daily as construction activity levels change. The Project will be required to comply with several standard fugitive dust control measures, per MDAQMD Rule 403. The following measures were factored into CalEEMod and are based on data provided by DAQMD:

- Utilize soil stabilizers - 30% PM10 and PM2.5 reduction.
- Replace ground cover - 15% PM10 and PM2.5 reduction.
- Water exposed areas 2x per day.

Daily construction emissions based on the above-described parameters are shown in Table 4.3.3 below.

Table 4.3.3: Construction Emissions (Daily Maximum)

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	ROG	CO	SOx	PM10	PM2.5
Project Emissions	29.2	27.0	30.2	0.05	15.2	8.27
Regional Threshold	137	137	548	137	82	65
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO

Source: MDAQMD and CalEEMod 2020.4.0

Operational Emissions

The Project would be operated as a residential subdivision. Typical operational characteristics include residents and visitors traveling to and from the site, delivery of goods and services to the residents, and maintenance activities. Table 4.3-4 shows the Mojave Desert Air Quality Management District thresholds for operational emissions compared to the Project's maximum daily emissions.

Table 4.3.4: Operational Emissions (Daily Maximum)

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	ROG	CO	SOx	PM10	PM2.5
Project Emissions	2.26	5.26	28.3	0.07	4.67	2.23
Regional Threshold	137	137	548	137	52	65
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO

Source: MDAQMD and CalEEMod 2020.4.0

As shown in Tables 4.3.3 and 4.3.4 above, both construction and operational related emissions would not exceed MDAQMD thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during operation and would not contribute to an existing or projected air quality violation, on a direct or cumulative basis. As such, impacts are less than significant, and no mitigation measures are required.

Threshold 4.3 c): Would the project expose sensitive receptors to substantial pollutant *concentrations?*

Less Than Significant Impact

The Project is a residential subdivision and does not produce toxic air emissions such as those generated by industrial manufacturing uses or uses that generate heavy-duty diesel truck emissions. According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The nearest sensitive receptors are the residential neighborhood located adjacent to the Project site to the east by approximately 100 feet.

The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- Any industrial project within 1,000 feet
- A distribution center (40 or more trucks per day) within 1,000 feet
- A major transportation project (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 Project is a proposal to subdivide two current parcels totaling 10 acres into 48 separate single-family parcels. The Project does not meet the criteria listed above. As such, no impact will occur.

Threshold 4.3 d): Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact

Potential odor sources associated with the 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.

The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

4.4 Biological Resources

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

- General Biological Resource Assessment and Preliminary Jurisdictional Delineation Report Seneca and Hampton Tract 20723, included as Appendix B to this Initial Study.

Threshold 4.4 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✓		
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 Game or US Fish and Wildlife Service?			✓	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			✓	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✓		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Threshold 4.4 a): Would the project Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated

As part of the environmental process, California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) data sources were reviewed. Following the data review, surveys were performed on the site on September 6, 2024, during which the biological resources on the site and in the surrounding areas were documented by the biologist Darian Wong. As part of the surveys, the property and the adjoining areas were evaluated for the presence of native habitats that may support populations of candidate, sensitive, or special status species plant and wildlife species. The property was also evaluated for the presence of sensitive habitats including wetlands, vernal pools, riparian habitats, and jurisdictional areas. Habitat assessments were also conducted for desert tortoise, burrowing owl, and Mohave ground squirrel based on data from USFWS, CDFW, and a search of the California Natural Diversity Database.

Plant Species

The Project site and buffer area is dominated by disturbed creosote bush (Larrea tridentata) scrub habitat. This habitat is characterized by dispersed creosote bush, invasive grasses and the Joshua tree (Yucca brevifolia). The Project site has significantly deteriorated due to nearby residential activities, off-highway vehicles (OHV), invasive weeds, and illegal dumping. Aside from the dominant species of creosote bush (Larrea tridentata), other plant species observed include California buckwheat *(Eriogonum fasciculatum)*, rubber rabbitbrush *(Ericameria nauseosa)*, Cheesebush *(Ambrosia salsola)*, red brome (Bromus rubens), black mustard (Brassica nigra) and Joshua tree *(Yucca brevifolia)*. The only other ground cover that exists within the Project site is bare ground, which exists due to excessive vehicular traffic. Table 4.4.1, Presence of Candidate, Sensitive, or Special Status Plant Species, identifies the plant species that may be impacted by the Project.

Table 4.4.1: Presence of Candidate, Sensitive, or Special Status Plant Species

Species	Status	Presence/Absence
White pygmy-poppy *Canbya candida*	CNPS 4.2	**Habitat Present.** The study area contains marginally suitable (low potential) disturbed Mojave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.
Mojave monkeyflower *Diplacus mohavensis*	CNPS 1B.2	**Habitat Present.** The study area contains marginally suitable (low potential) disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.
Booth's evening-primrose *Eremothera boothii* ssp. *boothii*	CNSP 2B.3	**Habitat Present.** The study area contains marginally suitable (low potential) disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.

Species	Status	Presence/Absence
Sagebrush loeflingia *Loeflingia squarrosa var. artemisiarum*	CNPS 2B.2	**Habitat Present.** The study area contains marginally suitable (low potential) disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.
Short-joint beavertail *Opuntia basilaris* var. *brachyclada*	CNPS 1B.2	**Habitat Present.** Although the study area contains marginally suitable (low potential) disturbed Mohave desert scrub and Joshua tree woodland, no individuals were observed in the study area during habitat assessment surveys. There are no CNDDB documented occurrences in the study area or vicinity.
Beaver Dam breadroot *Pediomelum castoreum*	CNPS 1B.2	**Habitat Present.** The study area contains marginally suitable (low potential) disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.
Southern mountains skullcap *Scutellaria bolanderi ssp. austromontana*	CNPS 1B.2	**No Habitat.** The study area does not contain suitable wetland-riparian or woodland habitats capable of supporting this species and is outside species range.
San Bernardino aster *Symphyotrichum defoliatum*	CNPS 1B.2	**No Habitat.** The study area does not contain suitable coastal, wetland, or mountain habitats capable of supporting this species.
Joshua Tree *Yucca brevifolia*	CESA protected	**Species Present.** The study area contains suitable disturbed Mohave desert scrub and Joshua tree woodland. Several individuals of Joshua tree were documented within the project area.
CNPS 1B.2- Plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California; **CNPS 2B.2**-Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California; **CNPS 2B.3-**Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California; **CNPS 4.2**- Plants of limited distribution; fairly threatened in California; **CESA** Species that are protected under the California Endangered Species Act.		

Because there is suitable habitat for the CNPS sensitive plant species, listed in Table 4.4.1 above, the following mitigation measure is required.

California Native Plant Society (CNPS) Mitigation Measure

MM BIO-1: Pre-Construction Sensitive Plant Clearance Survey. Prior to Project implementation, and during the appropriate season, a qualified biologist shall conduct botanical field surveys within the Project area following protocols set forth in the California Department of Fish and Wildlife's (CDFW) 2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special-status and locally significant plants, and familiar with the appropriate state and federal statutes related

to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any special-status plants are identified, the Project Applicant shall avoid the plant(s), with an appropriate buffer (i.e., fencing or flagging). If complete avoidance is not feasible, the Project Applicant shall mitigate the loss of the plant(s) through the purchase of mitigation credits from a CDFW-approved bank and/or land acquisition and conservation at a mitigation ratio determined by CDFW after Project analysis. If the Project has the potential to impact a state-listed species, the Project Applicant should apply for a California Endangered Species Act (CESA) Incidental Take Permit (ITP) with CDFW.

Western Joshua Tree

A Joshua Tree Survey was performed on November 24, 2024, as part of the General Biological Resource Assessment and Preliminary Jurisdictional Delineation (Appendix B of this Initial Study). A total of 38 WJT were identified within the Project area and a 50-foot buffer surveyed for the census. Of these, 15 were alive and 23 were dead. Take of WJT will be inevitable as they are within the Project area. Additionally, 12 WJT will potentially be impacted as they are within 50 feet of the Project site. See Figures 4.4.1 and 4.4.2 below for locations of observed WJT.

CDFW may also require relocation of live individuals based on their class and health. CDFW's Western Joshua Tree Relocation Guidelines and Protocols outlines two methods of relocations: tree spade and bare root (CDFW 2024). Bare root relocation typically involves using hand tools or heavy equipment to excavate the tree's root ball by trenching around the individual and salvaging as much root and the surrounding soil as possible. The tree spade relocation method involves using heavy equipment to fully encapsulate the tree and roots and lift it out of its original position. It will then be transported to a recipient site. (CDFW 2024).

As shown in Figure 4.4.1 and 4.4.2, Locations of Joshua Trees, development of the Project will result in impacts to every WJT on the site when considering a 50-foot buffer zone for each WJT and the size of the Project site being 10.05 acres.

As shown on Figure 4.4.1, and Figure 4.4.2, Locations of Joshua Trees, the preservation or relocation onsite is not a viable option and would essentially prevent development of the site at the density allowed by the General Plan. The Project may also need to comply with the Western Joshua Tree Conservation Act relocation requirements, which outlines methods to salvage WJT and provides resources to calculate the number of individuals to move to a recipient site. Based on the biological report, if the applicant were to only use Bare Root relocation, four WJT will need to be relocated, and three WJT would need to be relocated if only the tree spade method were to be used. If the applicant elects to utilize both methods, the quantity of the trees that may need to be relocated will change.

Figure 4.4.1 – Location of Joshua Trees (North)

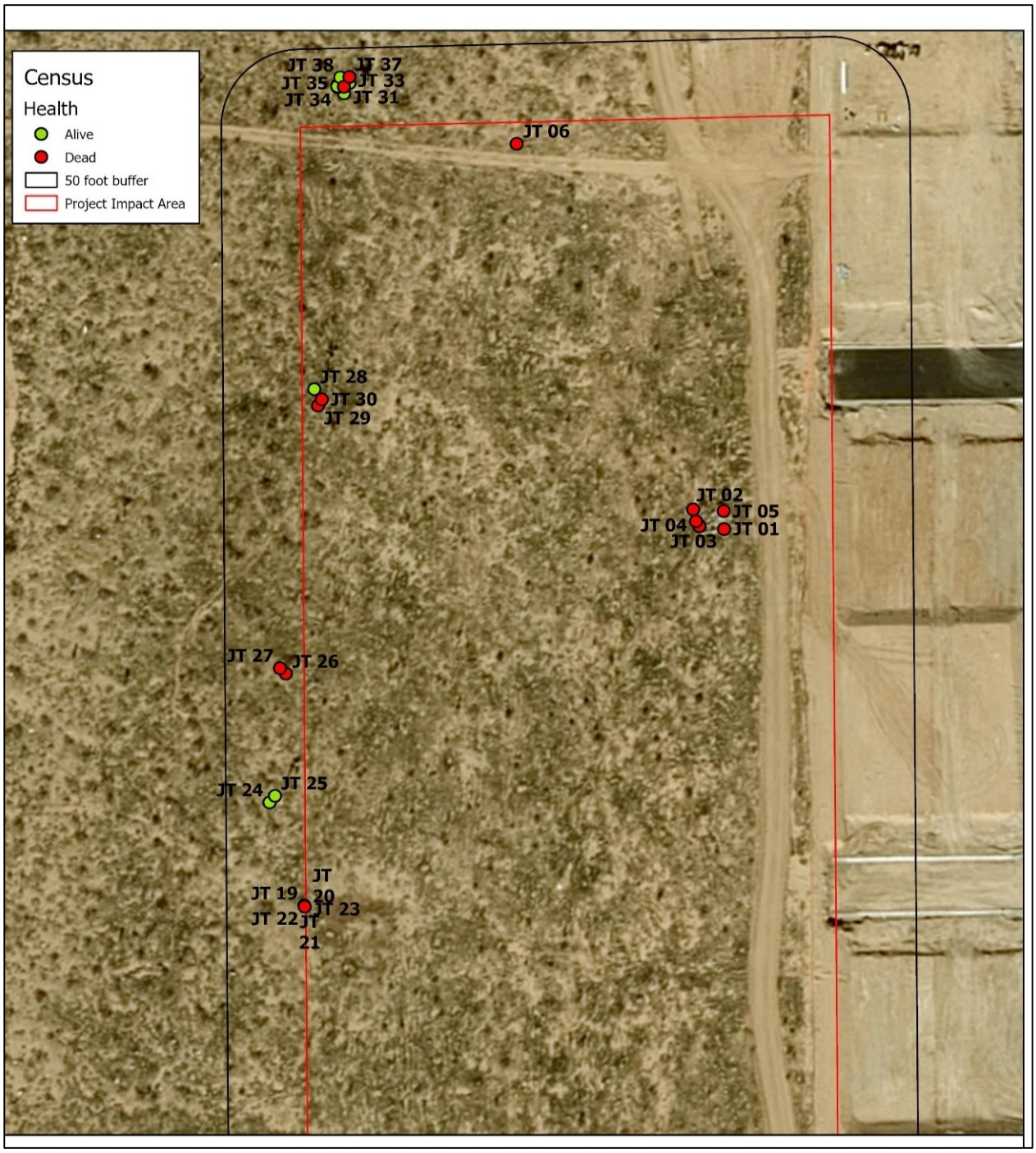
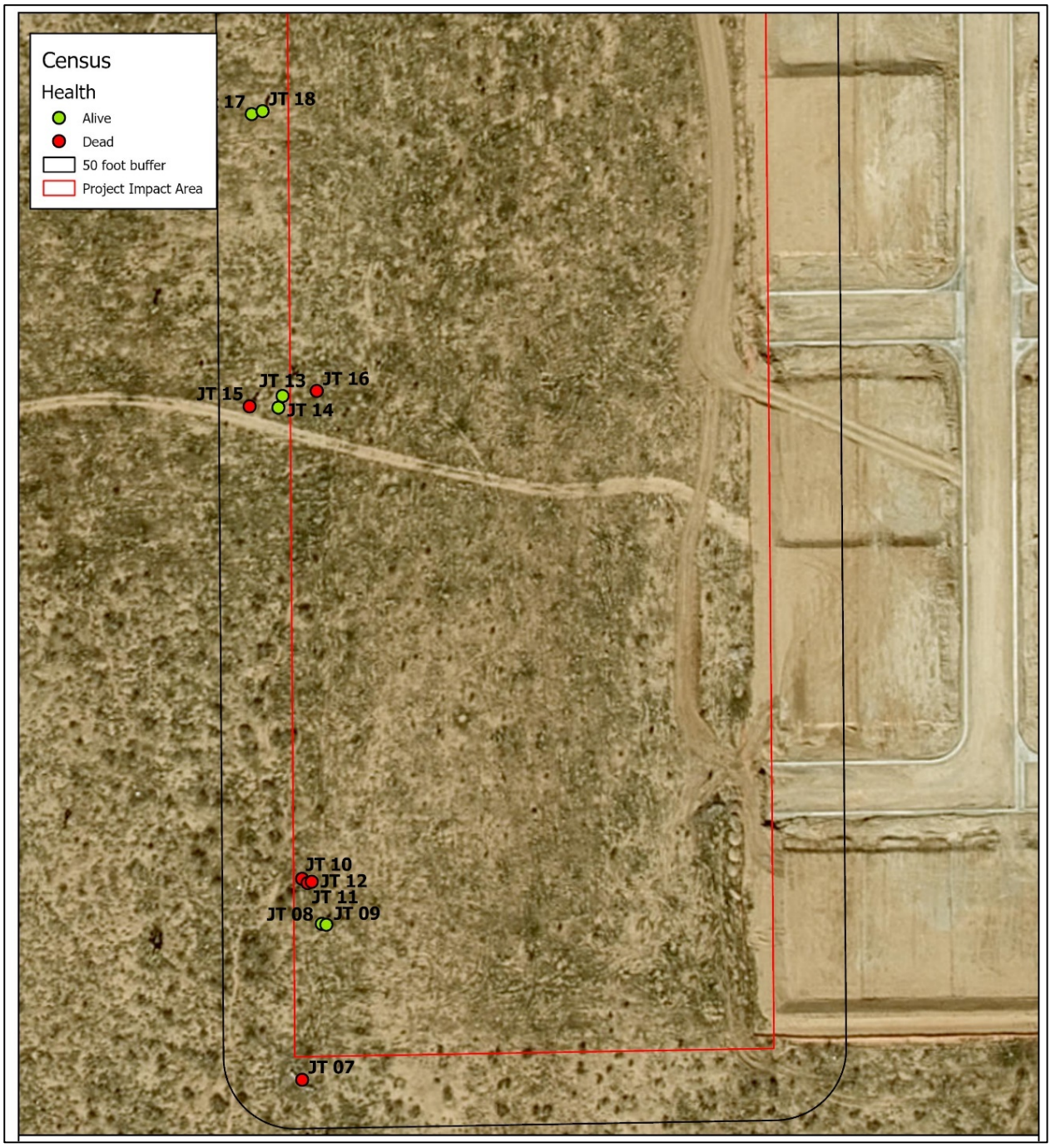


Figure 4.4.2 – Location of Joshua Trees (South)



If relocation is required by CDFW, a desert native plant specialist will need to be onsite to monitor the health and ensure that all feasible measures to maximize the tree's survival is utilized. These include but are not limited to being handled correctly, relocated during the correct time and season and also into the proper habitat, substrate and orientation. If relocation is deemed necessary by CDFW, a Western Joshua Tree relocation plan will be developed and the number of trees to be relocated will be determined based on CDFW's "Salvage Requirement Calculator Spreadsheet". A desert native plant specialist will be onsite during relocation to monitor activities. The relocated WJT will be monitored during a post-relocation maintenance period where the permittee must utilize feasible measures to maximize the tree's survival. Therefore, Mitigation Measure BIO-2 is recommended.

MM BIO-2: Western Joshua Tree Incidental Take Permit. The western Joshua tree is a candidate threatened species under the California Endangered Species Act. If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) under Section §2081b of the California Endangered Species Act (CESA), or under the Western Joshua Tree Conservation Act (Fish & G. Code, §§1927-1927.12), prior to the relocation, removal, or take. (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§2080 & 2085 and §§1927-1927.12). Mitigation for CESA will occur at a minimum 1:1 or per the stem count per the WJTCA census in lieu fee. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met: (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height. (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree. (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees. (4) CDFW may require the permittee to relocate one or more of the western Joshua trees.

The City of Adelanto falls within an area of the WJTCA that qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). Mitigations fees are updated annually. For the current fees, please visit: Western Joshua Tree Conservation Act Incidental Take Permit. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive.

It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

Wildlife Species

Wildlife species observed were indicative of a highly disturbed habitat with bird species like common ravens (Covus corax), and rock dove (Columba livia) being most common. Other bird species observed included the white-crowned sparrow (Zonotrichia leucophrys), European starling (Sturnus vulgaris) and mourning dove (Zenaida macroura). Mammal species observed included the white-tailed antelope squirrel (Ammospermophilus leucurus), and California ground squirrel (Otospermophilus beecheyi). Only one reptile, western fence lizard (Sceloporus occidentalis) was observed onsite. As part of the environmental process, a search of the California Natural Diversity Database (CNDDB) was performed. Based on this review, it was determined that five special status species have been documented within the Adelanto quad of property. The following tables provide data on each special status species which has been documented in the area. Table 4.4.1 provides a summary of all wildlife species that may be in the Project area.

Table 4.4.1: Presence of Candidate, Sensitive, or Special Status Wildlife Species

Species	Status	Presence/Absence
Desert Tortoise	FT, ST	**Habitat Present:** The site is located within the known distribution of the species. An evaluation of the area and property was conducted, and no tortoises or suitable habitat was observed.
Golden Eagle *Aquila chrysaetos*	FP	**Habitat Present.** The study area contains potentially suitable foraging habitat (low potential). There are no CNDDB documented occurrences in the study area.
Mohave Ground Squirrel *Xerospermophilus mohavensis*	ST	**Habitat Present.** The study area contains potentially suitable (low potential) disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area
loggerhead shrike *Lanius ludovicianus*	SSC	**Habitat Present.** The study area contains marginally suitable (lo potential) disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.
Le Conte's thrasher *Toxostoma lecontei*	SSC	**Habitat Present.** The study area contains marginally suitable disturbed Mohave desert scrub and Joshua tree woodland. There are no CNDDB documented occurrences in the study area.
Pallid Bat *Antrozous pallidus*	SSC	**Habitat Present.** The study area contains potentially suitable (low potential) foraging habitat. There are no CNDDB documented occurrences in the study area.
western mastiff bat *Eumops perotis californicus*	SSC	**Habitat Present.** The study area contains potentially suitable (low potential) foraging habitat. There are no CNDDB documented occurrences in the study area.

Species	Status	Presence/Absence
Burrowing Owl	CS	**Habitat Present.** The study area contains potentially suitable (moderate potential) disturbed Mohave desert scrub and Joshua tree woodland. Potentially suitable small mammal burrows and diagnostic signs were observed during habitat assessment surveys. There are no CNDDB documented occurrences in the study area.
Crotch's bumble bee	CS	**Within Range.** The Project site is within the range of the candidate CESA-threatened Crotch's bumble bee and the Project has the potential to result in permanent loss, degradation, and impacts to Crotch's bumble bee habitat.
Federal Threatened (FT); Federal Proposed (FP); State Threatened (ST); Candidate Species (CS) State Species of Special Concern (SSC)		

Wildlife Species Mitigation Measures

As shown in Table 4.4-1 above, habitat is present for nine sensitive wildlife species. Because focused surveys were not conducted, Project implementation, including grading, vegetation removal and construction, may result in direct mortality, population declines, or local extirpation of sensitive wildlife species that were not previously known or identified. Therefore, the following mitigation measures are required.

Burrowing Owl

MM BIO-3: Burrowing Owl Pre-Construction Survey. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a "take avoidance survey" should be conducted by a qualified Biologist for the project site and surrounding 500 ft radius utilizing the methodology provided in CDFW's 2012 Staff Report on Burrowing Owl Mitigation. This survey should be conducted no more than 14 days prior to initiation of ground disturbance activities. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. Should no Burrowing Owls be detected during the initial "take avoidance survey", the survey should be repeated within 24 hours prior to ground disturbance to determine if the Project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the Project site. If both surveys reveal no burrowing owls, active burrowing owl burrows or perch sites with active sign (molted feathers, cast pellets, prey remains, eggshell fragments, decoration, or excrement) thereof, no additional actions related to this measure are required and a report shall be prepared by the qualified biologist documenting the results of the survey including all requirement for survey reports (page 30 of the 2012 Staff Report). The report shall be submitted to CDFW for review prior to construction. If burrowing owl, active burrows or signs thereof are found the qualified biologist shall prepare and implement a plan for avoidance, minimization, and mitigation measures to be review and approved by CDFW for review and approval at least 30 days prior to initiation of ground disturbing activities. The Burrowing Owl Plan shall describe proposed avoidance,

minimization, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. Project activities shall not occur within 1000 feet of an active burrow until CDFW approves the Burrowing Owl Plan. If the Project cannot ensure burrowing owls and their burrows are fully avoided, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to potentially acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081 subdivision (b). Full mitigation often involves the permanent conservation of quality habitat benefiting the species through a conservation easement, along with habitat enhancement and ongoing management funded appropriately. Passive relocation, performed according to the Staff Report on Burrowing Owl Mitigation (CDGW, 2012) may be authorized through the incidental take permit as a minimization measure.

Nesting Birds

MM BIO-4: Nesting Bird Survey. Regardless of the time of year, a pre-construction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of Project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws

Desert Tortoise

MM BIO-5: Desert Tortoise Pre-Construction Survey. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a preconstruction survey for desert tortoise is recommended following the USFWS guidelines for Preparing for any Action that may occur Within the Range of the Mojave Desert Tortoise (Gopherus agassizii). This would consist of one complete (100% coverage) protocol level presence or absence survey of the Project area and 500-foot buffer of suitable habitat prior to the initiation of construction at any time of year. The survey should be conducted no more than 48 hours prior to construction beginning and after any pause in Project activities lasting 30 days or more, in accordance with the USFWS 2009 desert tortoise survey methodology by a CDFW Approved Biologist. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the survey shall be submitted to CDFW prior to the start of Project activities. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If desert tortoise is found on the project site during preconstruction surveys, construction will be halted until the tortoise has left the area on its own and is no longer in danger. If the tortoise does not leave on its own, translocation of desert tortoise shall only be conducted with necessary federal ESA and state CESA permitting, and via an approved translocation plan pursuant to the above permits. The Project proponent shall not undertake Project activities and Project activities shall be postponed until appropriate authorization [i.e., California Endanger Species Act (CESA) Incidental Take Permit under Fish and Game Code section 2081] is obtained. Prior to the start of construction or any ground disturbance, a qualified biologist should prepare a Desert Tortoise Translocation Plan (DTTP) to be administered during the construction and operation of the project. The DTTP should be submitted to the City of Adelanto for review and approval and shall be updated and utilized for translocation and monitoring after construction. The DTTP should include, but not be limited to the following: 1. Discussion on temporary construction fencing (if any), 2. Description of clearance surveys of permanent exclusion areas, 3. Transportation and release procedures, 4. Construction Schedule, 5. Translocation/relocation areas, 6. Monitoring and reporting.

Mohave Ground Squirrel

MM BIO-6: Pre-Construction Mohave Ground Squirrel Survey. Prior to the initiation of ground disturbing activities, focused pre-construction clearance surveys throughout the Project site for Mohave ground squirrel will be conducted by a qualified biologist familiar with the species' behavior and life history. Focused Mohave ground squirrel surveys shall follow the California Department of Fish and Game Mohave Ground Squirrel Survey Guidelines (CDFW 2023). Visual surveys will be conducted prior to ground disturbing activities commencing between March 15 and April 15, visual

surveys shall be conducted on the Project site during daylight hours by a qualified biologist who can readily identify Mohave ground squirrel *(Xerospermophilus mohavensis)* and white-tailed antelope squirrel *(Ammospermophilus leucurus)*. If the results of the survey confirm absence, then the Qualified Biologist shall ensure Mojave ground squirrels do not enter the Project site. If the survey or monitoring throughout the duration of the Project confirms presence, the Project proponent shall obtain an Incidental Take Permit (ITP) for Mohave ground squirrel. The ITP will specify avoidance, minimization, and mitigation conditions for temporary and/or permanent impacts to Mohave ground squirrel including habitat acquisition at a CDFW approved location and mitigation ratio.

Crotch's Bumble Bee

MM BIO-7: Crotch's Bumble Bee Habitat Assessment. Prior to vegetation removal and/or grading, a Designated Biologist shall conduct a habitat assessment to determine whether Crotch's bumble bee habitat is present or absent in the Project site and adjoining area. The habitat assessment shall be performed according to the 2023 CDFW Survey Considerations for CESA Candidate Bumble Bees.

If habitat for Crotch's bumble bee is present, a Designated Biologist shall conduct focused surveys prior to vegetation removal and/or grading for the presence/absence of Crotch's bumble bee. Survey methodology shall follow the 2023 CDFW Survey Considerations for Candidate Bumble Bee. Surveys shall be conducted during the flying season when the species is most likely to be detected above ground, between March 1 to September 1, by an approved Designated Biologist familiar with Crotch's bumble bee behavior and life history. Surveys shall be conducted within the Project site and areas adjacent to the Project site where suitable habitat exists. Survey results including negative findings shall be submitted to CDFW at least 30 days prior to Project-related vegetation removal and/or ground-disturbing activities. If the species is identified on site, Project Proponent shall fully avoid the species absent take authorization. If the Project may result in take of Crotch's bumble bee through either nest destruction or destruction of potential nests hidden in bunch grasses or other nesting habitat, or if complete avoidance of Crotch's bumble bee cannot be achieved, Project activities shall be postponed until appropriate authorization (i.e., a finalized CESA ITP under Fish and Game Code §2081) is obtained.

With the implementation of Mitigation Measures **BIO-1** through **BIO-7,** impacts would be less significant relating to candidate, sensitive, or special status plant and wildlife species.

Threshold 4.4 b): Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Less Than Significant Impact

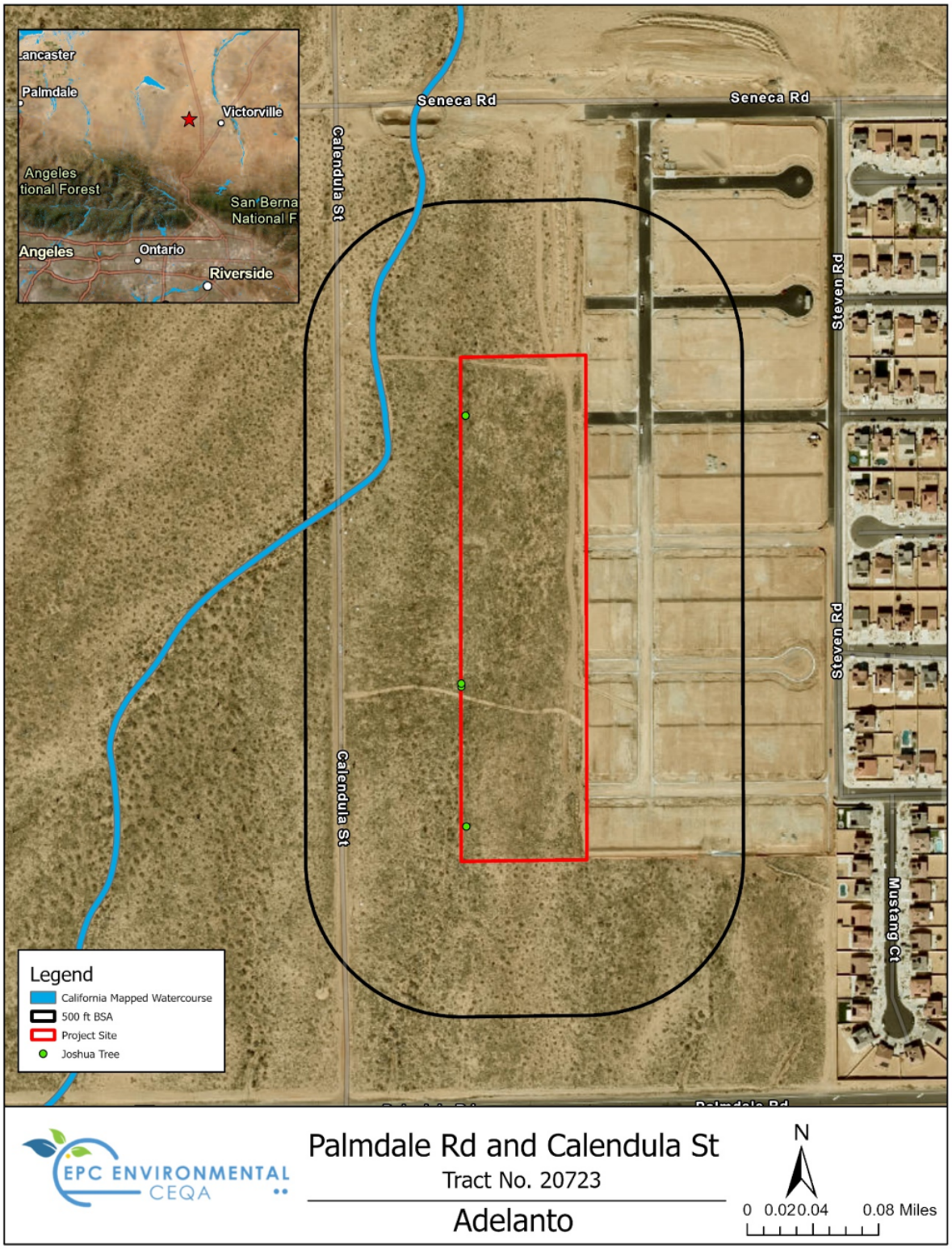
No riparian vegetation (e.g., cottonwoods, willows) exists on the site or in adjacent habitats.

Threshold 4.4 c): Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact

A preliminary jurisdictional delineation was conducted within the project site and buffer area. (Appendix B). The delineation yielded no evidence of any federal or state jurisdictional wetland or watercourse within the Project's boundaries. However, a mapped blue lined stream is located approximately 200 feet west of the Project site. (See Figure 4.4.3, California Mapped Watercourse. The Project does not propose any off-site improvements or activities (e.g. roads, infrastructure, utilities, or ground disturbance) that would result in any indirect, or direct, removal, filling, hydrological interruption of the watercourse.

Figure 4.4.3 – California Mapped Watercourse



Threshold 4.4 d): Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact

Wildlife corridors link areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. Corridors effectively act as links between different populations of a species. The Project site does not represent a wildlife travel route, crossing, or regional movement corridor between large open space habitats. Surveys of the project site and surrounding area found that the Project site serves as low quality habitat for wildlife movement due to the high disturbance and human activity on and near the site. A busy roadway exists to the south, a residential tract to the east, and more disturbed open space to the north and west.

Threshold 4.4 e): Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact With Mitigation Incorporated

MM BIO-2, Western Joshua Tree Incidental Take Permit applies. Please refer to the discussion under Threshold 4.4(a) regarding the Joshua trees.

Threshold 4.4 f): Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

Regional multiple species conservation plans offer long-term assurances for conservation of covered species at a landscape scale, in exchange for biologically appropriate levels of incidental take and/or habitat loss as defined in the approved plan. California's NCCP Act (FGC §2800 et seq.) governs such plans at the state level, and was designed to conserve species, natural communities, ecosystems, and ecological processes across a jurisdiction or a collection of jurisdictions. Complementary federal HCPs are governed by the Endangered Species Act (7 U.S.C.).

Section 136, 16 U.S.C. §1531 et seq.) (ESA). Regional conservation plans provide conservation for unlisted as well as listed species. According to the California Natural Community Conservation Plans Map maintained by the California Department of Fish and Wildlife, there are no such plans that encompass the Project site.[9]

9 California Natural Community Conservation Plans Map, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed on November 4, 2024.

4.5 Cultural Resources

Threshold 4.5 Would the Project (Except as	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?		✓		

Threshold 4.5 a): Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

No Impact

Records Search

A "cultural resources records search" is a review of historical records and databases to identify any known historical or archaeological resources within a specific geographic area where development is proposed. Cultural resource record searches are provided by the California Historical Resource Information System (SCCIC) located on the campus of California State University, Fullerton. The SCCIC is the State of California's official cultural resource records repository for the County of San Bernardino. There have been seven cultural resources record searches conducted within the vicinity of the project site (including the area within the Project site itself). No cultural or historic resources have been identified within the 0.5-mile research radius.[10]

The Project site has been recently disturbed, and there are no structures on the property. As such, the project would not impact any surface historic cultural resources.

10 Cultural Resources Assessment, Villa and Aster Project, Adelanto, BCR Consulting LLC, July 18, 2022.

Threshold 4.5 b): Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

Less Than Significant Impact With Mitigation Incorporated

Archaeological Setting

As noted above under Threshold 4.5 a), although no surface cultural resources (including historic-period or prehistoric archaeological resources, or historic-period architectural resources) or cultural resource sensitivity were identified on or near the Project site, future ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Therefore, the following measures are recommended:

MM CR-1: Cultural Resources Discovery. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If 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 discovery. Work on the other portions of the Project outside the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department 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 discovery, to provide Tribal input with regards to significance and treatment.

MM CR-2: Monitoring and Treatment Plan. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: "If significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly."

Threshold 4.5 c): Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact with Mitigation Incorporated

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

4.6 Energy

Threshold 4.6 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

Threshold 4.6 a): Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact

Electricity and Natural Gas

Construction

The Project would require the use of electric power tools. The anticipated construction schedule assumes the Project would require approximately 13 months for completion of build-out. The consumption of electricity would be temporary in nature and would not represent a significant demand for available supplies. The use of natural gas is not anticipated to be used during construction.

Operations

Occupancy of single-family residences would result in the consumption of natural gas and electricity. Energy demands are estimated at 1,376,747 kBTU/year of natural gas and 334,823 kWh/year of electricity.[11] Natural gas would be supplied to the Project by Southwest Gas Corporation, and electricity would be supplied by SCE. The Project proposes single-family homes reflecting contemporary energy-efficient/energy-conserving and operational programs. The Project does not propose uses that are inherently energy intensive, and the energy demands in total would be comparable to other single-family land use projects of similar scale and configuration. The Project will comply with the applicable Title 24 standards.

In addition, the Project will be required to provide rooftop solar panels, or sources of onsite renewable energy, per the latest 2019 California Energy Code requirements. The Energy Code requires all new residential construction to achieve net-zero emissions associated with electricity usage using onsite renewable sources. This analysis has conservatively assumed 80% of electricity

11 Appendix A, TTM20723 CalEEMod Data Sheets.

usage will be captured via on-site renewable sources (i.e., solar panels), as part of the Project design.

Motor Vehicle Fuels

Construction

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

The consumption of fuel would be temporary in nature and would not represent a significant demand for available supplies. Given the physical characteristics of the site and the type of development proposed, no unusual Project characteristics or construction processes would require the use of equipment that would use more fuel than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). In addition, as required by state law,[12] idling times of construction vehicles is limited to no more than 5 minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Equipment employed in the construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel.

Operations

Fuel that would be consumed by Project-generated traffic is a function of total vehicle miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. The Project will result in 1,613,123 annual VMT[13] and an estimated annual fuel consumption of 43,799 gallons of fuel.[14]

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

Conclusion

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

12 California Code of Regulations Title 13, Motor Vehicles, §2449(d)(3) Idling.
13 TTM20471 CalEEMod Datasheets.
14 EPA, *2020 Automotive Trend Report*, https://www.epa.gov/automotive-trends/explore-automotive-trends-data, accessed November 4, 2024.

Threshold 4.6 b): Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact

The regulations directly applicable to the Project are Building Energy Efficiency Standards, Title 24, Part 6, and CALGreen Title 24, Part 11. These regulations include but are not limited to the use of energy-efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems. The Project is required to demonstrate compliance with these regulations as part of the building permit and inspection process.

4.7 Geology and Soils

Threshold 4.7 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?			✓	
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable because of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			✓	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?			✓	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Threshold 4.7 a): Would the Project 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.

No Impact

Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California. (A trace is a line on the earth's surface defining a fault.) Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally 50 feet[15]). According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located within an Alquist-Priolo Earthquake Fault zone.[16]

Threshold 4.7 a): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii) Strong seismic ground shaking?

Less Than Significant Impact

The Project site is in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the Southern California area. As a mandatory condition of Project approval, the Project would be required to construct the proposed structures in accordance with the seismic design criteria mandated by the Adelanto Municipal Code Title 14, *Buildings and Construction*. The purpose of this Title is, in part, to provide minimum standards to safeguard life or property by stipulating building and foundation requirement to withstand earthquake.

Threshold 4.7 a): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact

According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located in a liquefaction zone.[17] Notwithstanding, the Project would be required to comply with Development Code Section 16-5.02.060(b)(2), Soils Engineering

15 https://www.conservation.ca.gov/cgs/alquist-priolo.
16 https://maps.conservation.ca.gov/geologichazards/#dataviewer, accessed November 4, 2024.
17 https://maps.conservation.ca.gov/geologichazards/#dataviewer, accessed November 2, 2024.

Report, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Threshold 4.7 a): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv) Landslides?

No Impact

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

Threshold 4.7 b): Would the Project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact

The Project will not result in substantial soil erosion or the loss of topsoil, because the site will be paved and landscaped after it is developed. To control soil erosion during construction, the Project proponent is required to comply with Chapter 17.93-*Erosion and Sediment Control* of the Adelanto Municipal Code, which serves to implement the National Pollutant Discharge Elimination System (NPDES) requirements applicable to the Project area and prepare a Storm Water Pollution Prevention Plan (SWPPP). In addition, a Water Quality Management Plan (WQMP) is required that addresses post-construction soil erosion. Preparation and implementation of these plans is a mandatory requirement.

The SWPPP will identify potential sources of erosion and sedimentation loss of topsoil during construction and identify erosion-control measures to reduce or eliminate the erosion and loss of topsoil, such as the use of silt fencing, fiber rolls, gravel bags, stabilized construction entrance/ exit, hydroseeding.

Post-construction, much of the site will be covered with paving, structures, and landscaping, which will reduce soil erosion. As detailed in Threshold 4.10(a), *Hydrology and Water Quality*, stormwater will be controlled using a single basin designed to implement water quality and flood control requirements. Stormwater treatment will be provided by the bottom 1 to 2 feet of the basin, where the required volume will infiltrate into the ground, and any soil erosion materials will be managed.

(Also see analysis under Issue 4.10, *Hydrology and Water Quality)*.

Threshold 4.7 c): Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact

Landslide/Lateral Spreading

"Lateral spread" or "flow" are terms referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water. All the land within the Project site is relatively flat and according to the County of San Bernardino Hazard Maps, is not located in areas prone to landslides; thus, there are no slopes that may contribute to lateral spreading.

Subsidence

Subsidence is the downward movement of the ground caused by the underlying soil conditions. Certain soils, such as clay soils, are particularly vulnerable because they shrink and swell depending on their moisture content. Subsidence is an issue if buildings or structures sink, which causes damage to the building or structure. Subsidence is usually remedied by excavating the soil at the depth of the underlying bedrock and then recompacting the soil so that it can support buildings and structures.

Liquefaction or Collapse

Liquefaction may occur during seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause soils to liquefy and temporarily behave as a dense fluid.

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

Based on the California Geological Survey, the site is not mapped within a zone of potentially liquefiable soils. Based on groundwater data (http://www.water.ca.gov/waterdatalibrary/), it is estimated that groundwater is at a depth of 178 feet below the existing grade. The site is also not included within the San Bernardino County Geologic Hazards Maps as being located within an area with a liquefaction hazard. Liquefaction is not considered to be a hazard at the subject site due to the great depth of groundwater (greater than 178 feet) and the current geologic hazard mapping. As such, impacts would be less than significant, and no impacts related to subsidence, liquefaction, and collapse will occur through compliance with the California Building Standards Code also known as California Code of Regulations Title 24.

Threshold 4.7 d): Would the Project be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?

Less Than Significant Impact

Expansive soils generally consist of clay that tends to expand (increase in volume) as it absorbs water, and it will shrink (lessen in volume) as water is drawn away. According to the Natural Resources Conservation Service, United States Department of Agriculture, Web Soil Survey, the Project site primarily consists of soils classified as Bryman Loamy Fine Sand (100%).[18]

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

Threshold 4.7 e): Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact

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

Threshold 4.7 f): Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated

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

18 Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at the following link: http://websoilsurvey.sc.egov.usda.gov/. Accessed November 4, 2024.

The property is situated in the Mojave Desert geomorphic province. The Mojave Desert province is a wedge-shaped area that is enclosed on the southwest by the San Andreas fault zone, the Transverse Ranges province, and the Colorado Desert province, on the north and northeast by the Garlock fault zone, the Tehachapi Mountains, and the Basin and Range province, and on the east by the Nevada and Arizona state lines, and the Colorado River. The area is dominated by broad alluviated basins that are mostly aggrading surfaces that are receiving non-marine continental deposits from the adjacent upland areas. More specific to the subject property, the site is in an area geologically mapped to be underlain by Quaternary Alluvium. Alluvium is deposited as lakes, playas, and terraces and has the potential to contain paleontological resources. Therefore, the following mitigation measures are required.

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

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

With implementation of Mitigation Measures PALEO-1 and PALEO-2, impacts are less than significant regarding paleontological resources.

Unique Geologic Feature

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

4.8 Greenhouse Gas Emissions

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

- California Emission Estimator Model (CalEEMod) Data Sheets, EPC Environmental, November 4, 2024.
- Mojave Desert Air Quality Management District, California Environmental Quality Act (CEQA) And Federal Conformity Guidelines, February 2020.

Threshold 4.8 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Threshold 4.8 a): Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold 4.8 b): Would the project Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact

Generate Significant Greenhouse Gas Emissions

Pursuant to CEQA Guidelines §15064.4, when making a determination of the significance of greenhouse gas emissions, the "lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use." Moreover, CEQA Guidelines §15064.7(c) provides that "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts" on the condition that "the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

On January 8, 2025, the City Council adopted Resolution No. 25-03, City of Adelanto Greenhouse Gas Emissions Screening Tables Implementing Performance Standards Greenhouse Gas Emissions Screening Tables, to establish thresholds of significance for determining the significance of greenhouse gas emissions. The following are considered to have a less than significant impact on Greenhouse Gas Emissions under CEQA.

1. **Not a Project.** The activity is not a "project" as defined by CEQA Guidelines §15378.
2. **Statutory Exemptions.** The project is identified as a Statutory Exemption under CEQA Guidelines §15260 through §15285 322 3 3.
3. **Categorical Exemptions.** The project is identified as a Categorical Exemption under CEQA Guidelines §15300 through §15332.
4. **Transit Priority Projects/Sustainable Community Project**. The project is identified as a "Transit Priority Project/Sustainable Community Project" as defined by Public Resources Code §21555.
5. **Project GHG Emissions of LESS Than 3,000 MT CO2e Per Year**. Appendix A of City of Adelanto Greenhouse Gas Emissions Screening Tables Implementing Performance Standards Greenhouse Gas Emissions Screening Tables includes a table showing various sizes of typical land use development projects that are typically at or below that level of emissions. Applicants can also calculate emissions using the methodology described in the Screening Tables to calculate the quantity of GHG emissions.

A summary of the projected annual operational greenhouse gas emissions, including amortized construction-related emissions associated with the development of the Project, is provided in Table 4.8-1.

Table 4.8.1: Project Greenhouse Gas Emissions

Source	GHG Emissions
Construction (Amortized Over 30 Years)	9
Operational	769
TOTAL	**778**
Screening Threshold	**3,000**
Exceed Threshold?	**NO**

Source: CalEEMod Summary Report (Appendix A).

As shown on Table 4.8-1, the Project's greenhouse gas emissions would not exceed the City's screening thresholds. Thus, Project-related emissions are less than significant, and no further analysis is required.

Conflict with Greenhouse Gas Emissions Plan

Adelanto General Plan Program OS-18 requires the implementation of the strategies identified in the Regional Greenhouse Gas Reduction Plan to reduce its community greenhouse gas emissions consistent with the requirements of the Senate Bill (SB) 32. To fulfill this requirement, the City has prepared the "City of Adelanto, Greenhouse Gas Emissions Screening Tables Implementing Performance Standards" ("Screening Tables" document (Attachment B)). Adopting the Screening Tables will streamline the CEQA process for evaluating GHG impacts and determining significance. The Screening Tables represent the applicable plans, policies or

regulation adopted for the purpose of reducing the emissions of greenhouse gases under Threshold 4.8(b) above.

Per the Screening Tables, a Project that emits less than 3,000 MT CO2e per year is considered to be consistent with the applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Because the Project is estimated to emit 2,689 MT CO2e per year, impacts would be less than significant.

4.9 Hazards and Hazardous Materials

Threshold 4.9 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5, and, as a result, would it create a significant hazard to the public or the environment?				✓
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?				✓
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

Threshold 4.9 a): Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Threshold 4.9 b): Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact

Existing Conditions

The Project site consists of vacant undeveloped land. There have been no previous activities, such as agriculture or industrial uses that resulted in contamination of the Project site.

Construction Activities

Heavy equipment used during the construction of the proposed Project would be fueled and maintained by substances such as oil, diesel fuel, gasoline, hydraulic fluid, and other liquid materials that would be considered hazardous if improperly stored or handled. In addition, materials such as paints, roofing materials, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. The potential for unintentional releases and spills of hazardous materials during construction is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with future development that would be a reasonable consequence of the proposed Project than would occur on any other similar construction site.

Construction contractors are required to comply with all applicable federal, state, and local laws and regulations regarding hazardous materials, including but not limited to requirements imposed by the Environmental Protection Agency, California Department of Toxic Substances Control, Mojave Desert Air Quality Management District, and the Lahontan Regional Water Quality Control Board. As such, impacts due to construction activities would not cause a significant hazard to the public or the environment through the release of hazardous materials to the environment.

Operational Activities

The Project site would be developed with residential land uses that are not typically associated with the transport, use, or disposal of hazardous materials. Although residential land uses may utilize household products that contain toxic substances, such as cleansers, paints, adhesives, and solvents, these products are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to/from or use at the Project site.

Threshold 4.9 c): Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact

Columbia Middle School is located approximately 0.40 miles (2,050 feet) east of the Project site. As discussed in the responses to Thresholds 4.9(b) above, all hazardous or potentially hazardous materials would comply with all applicable federal, state, and local agencies and regulations with respect to hazardous materials. Therefore, regardless of the proximity of Columbia Middle School, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste that would impact the school.

Threshold 4.9 d): Would the project be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5, and, as a result, would it create a significant hazard to the public or the environment?

No Impact

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

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

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

Threshold 4.9 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?

No Impact

The following airports are located in or near Adelanto:

Adelanto Airport – This small airfield is located near the intersection of Holly Road and Beaver Road approximately 2.25 miles to the north of the Project site. This airport has two runways. Adelanto Airport is a privately owned airstrip with two unpaved runways. One runway extends north to south and is 3,930 feet long and 100 feet wide. The other runway extends east to west and is 5,100 feet long and 100 feet wide. Use of this airstrip is exclusively private, and permission is required prior to any aircraft landing. There is irregular attendance at this facility due to irregular use. All flight plans are required to be cleared with Southern California Logistics Airport (SCLA) to avoid conflicting traffic. Due to the private nature of the airstrip, the irregularity of flight scheduling, coordination with SCLA, and the distance of the east-west runway in relation to the Project site, impacts related to aircraft operations will be minimal.

Southern California Logistics Airport (SCLA) – SCLA is located approximately 5 miles to the northeast of the Project site in the City of Victorville. According to San Bernardino Countywide Plan Policy Map HZ-9, Airport Safety and Planning Areas, the Project site is not located within the boundaries of the SCLA *Comprehensive Land Use Plan* Compatibility Review Area for land use safety with respect to both occupants of aircraft and to people on the ground, protection of airspace, and general concerns related to aircraft overflight.

IMPA Adelanto Heliport – The IMPA Adelanto Heliport is privately owned by the Intermountain Power Agency (IMPA). It consists of a single concrete helipad that is 70 feet by 70 feet. The heliport is managed by the Los Angeles Department of Water and Power and is located at the Adelanto Converter Station near the intersection of Pansy Road and Raccoon Avenue approximately 2.4 miles north of the Project site. Permission is required prior to landing at this facility. Due to the irregular use of the heliport, impacts related to aircraft operations, and the distance to the Project site, impacts would be minimal.

Threshold 4.9 f): Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact

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

Threshold 4.9 g): Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact

According to the California Fire Hazard Severity Zone Viewer maintained by CAL FIRE, the Project site is not located within a high wildfire hazard area.[19] Also refer to analysis under Section 4.20, Wildfire.

[19] https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

4.10 Hydrology and Water Quality

The analysis in this section is based in part on the Preliminary Hydrology Study, Preliminary Drainage Report, United Engineering Group, October 9, 2024., included as Appendix C to this Initial Study.

Threshold 4.10 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:			✓	
(i) Result in substantial erosion or siltation on- or off- site?			✓	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			✓	
(iv) Impede or redirect flood flows?			✓	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			✓	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

Threshold 4.10 a): Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact

Construction Impacts

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

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

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

Operational Impacts

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

Post-construction, storm water will be controlled using a single basin for water quality and flood control. Storm water runoff will be routed to the basin using the streets, curbs, gutters, and swales. Stormwater treatment will be provided by the bottom 1 to 2 feet of the basin, where the required volume will infiltrate into the ground. The basin is designed to be compatible with the City of Adelanto Master Plan of Drainage. The development of the subject site will not significantly change area drainage patterns, impact any of the surrounding properties, or change any of the regional master plan facilities. The Project will construct a combination retention and detention basin of sufficient size to handle water quality through infiltration, and flood mitigation through detention. As designed, the basin exceeds the required storage volume.

Threshold 4.10 b): Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact

Ground Water Supply Discussion

The Project would be served with potable water by the Adelanto Public Utility Authority. Adelanto has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.[20] The Mojave Basin Area was the subject of a court-ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. The court ordered adjudication of the Mojave Basin Area allocates a variable free production allowance (FPA) to each purveyor that supplies more than 10 AFY, including Adelanto.

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

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

Groundwater Recharge Discussion

Development of the Project would increase impervious surface coverage on the Project site, which would in turn reduce the amount of direct infiltration of runoff into the ground. The Project proposes to use roads within the Project site to carry runoff to a proposed water quality basin,

20 2020 Urban Water Management Plan, Adelanto Water District, June 1, 2021, p.6-3, accessed on November 4, 2024.

designed for both retention and detention. As such, the Project will not interfere substantially with groundwater recharge.

In addition, according to a review of historical groundwater data (California Department of Water Resources and California State Water Resources Control Board groundwater well data depth to groundwater is greater than 50 feet below ground surface (bgs) in the general Project site area.[21] As such, the Project will not impact groundwater.

Sustainable Groundwater Management Discussion

California depends on groundwater for a major portion of its annual water supply, particularly during times of drought. This reliance on groundwater has resulted in overdrafts and unsustainable groundwater usage in many of California's basins. The Sustainable Groundwater Management Act (SGMA) was enacted to halt overdrafts and bring groundwater basins into balanced levels of pumping and recharge.[22] The City of Adelanto is located within the Upper Mojave River Valley portion of the Mojave River Basin.

The Mojave River is an adjudicated basin (i.e., water rights are determined by court order).[23]Ajudicated basins are exempt from the SGMA because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of a basin. No component of the Project would obstruct with or prevent implementation of the management plan for the Mojave River Basin. As such, the Project would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

Conclusion

Based on the analysis above, the Project is not forecast to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

[21] http://wdl.water.ca.gov and http://geotracker.waterboards.ca.gov]
[22] https://water.ca.gov/programs/groundwater-management/sgma-groundwater-management
[23] https://www.mojavewater.org/basin-management/watermaster/

Threshold 4.10 c): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:

(i) Result in substantial erosion or siltation on- or off- site?
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
(iv) Impede or redirect flood flows?

Less Than Significant Impact

Existing Condition/Pre-Development

The Project site is vacant, undeveloped, and undisturbed land with varying slopes. The offsite contributing areas to the subject site are from the south. There is an existing 36" storm drain serving the adjacent Tract No. 40401 to the east. The Project will need to collect and route the existing flows through the site and protect the development. The TTM is designed to collect and route the design storm through the site to catch basins. The Project is proposing a temporary dip section for the outlet of the channel to mimic existing drainage patterns. See Appendix C for additional detail.

Proposed Condition/Post Development

The proposed design will incorporate a controlled basin and outlets at various locations of the site, discharging to the north towards Seneca Road. This approach will maintain the existing drainage patterns. The site runoff has been routed to the basins using the streets and typical surface collection facilities for water quality and flood control. The Rationale method was prepared for the determination of time of concentrations for use in the development of the Unit Hydrographs.

The post-development runoff is then routed through the proposed basins to confirm post-development runoff can be mitigated to be less than pre-development runoff. The basins are proposed as dual-purpose retention and detention basins. The bottom 1 to 2 feet for the basins act as water quality retention only, with no outfall, relying solely on infiltration. The volume above served as detention volume for flood storage and was needed for peak flow mitigation. To drain the top flood storage, pipes connected to the regional channels have been used for preliminary calculations. After routing through the proposed basin, the average post-development 100-year runoff is 14.7 cfs as shown in Table 4.10-1, Pre-Development vs. Post Development Storm Water Runoff.

Table 4.10-1: Pre-Development vs. Post Development Storm Water Runoff

Source	GHG Emissions
Existing Condition	27.25 cfs
Design Criteria (90% of 27.25 cfs)	24.53 cfs
Post Development	17.45 cfs
Meets Requirement?	Yes

Source: CalEEMod Summary Report (Appendix A).

As shown in Table 4.10-1, the proposed development can be mitigated as designed to be compatible with the City of Adelanto Master Plan of Drainage. The development of the subject site will not significantly change area drainage patterns, impact any of the surrounding properties, or change any of the regional master plan facilities.

Threshold 4.10 d): Would the project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.[24] According to the California Department of Conservation, California Official Tsunami Inundation Maps,[25] the site is not located within a tsunami inundation zone. In addition, the Project would not be at risk from seiche because there is no water body around the Project site capable of producing as seiche.

Threshold 4.10 e): Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact

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

24 https://www.fema.gov/flood-maps, accessed on November 4, 2024.
25 California Department of Conservation, *California Official Tsunami Inundation Maps,* https://www.conservation.ca.gov/cgs/tsunami/maps#:~:text=Coordinated%20by%20Cal%20OES%2C%20California,considered%20tsunamis%20for%20each%20area., accessed November 4, 2024.

4.11 Land Use and Planning

Threshold 4.11 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide a community?			✓	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		✓		

Threshold 4.11 a): Would the project physically divide a community?

Less Than Significant Impact

An example of a Project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project site is located in an area that consists primarily of vacant undeveloped land. The nearest developed land is single-family residential neighborhoods adjacent to the east. Columbia Middle School is located approximately 0.4 miles (2,050 feet) to the east. The Project site is bordered on the north by vacant land and Seneca Road farther to the north; followed by vacant undeveloped land; on the south by vacant land and Palmdale Road followed by vacant undeveloped land; on the east by residential cul-de-sac neighborhoods; and to the east vacant land beyond Calendula Road. The Project site is planned for residential development by the General Plan. The properties in the immediate area are also planned for residential development except the general commercial land to the south of the Project site. Thus, the development of the Project site is a logical continuation of the development pattern in the area as proposed by the General Plan and will not divide an established community.

Threshold 4.11 b): Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact With Mitigation Incorporated

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

City of Adelanto General Plan

- *Land Use Element:* The General Plan Land Use and Zoning designation for the Project site is R-S5 (Single-Family Residential) which allows a maximum density of 5 dwellings per acre (50 dwellings). As evidenced throughout this Initial Study, all impacts have been identified as having no impact, a less than significant impact, or a less than significant impact with mitigation incorporated.
- *Circulation Element:* Please refer to Section 4. 17, Transportation, for analysis.
- *Conservation/Open Space Element:* Please refer to Sections 4.1, Aesthetics, and Section 4.4, Biological Resources, for the analysis.
- *Noise Element:* Please refer to Section 4.13, *Noise,* for the analysis.
- Safety Element: Please refer to Section 4.9, Hazards and Hazardous Materials, for the analysis.
- *Community Design Element:* Please refer to Section 4.1, Aesthetics, for the analysis.

City of Adelanto Zoning Ordinance

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

Mojave Desert Air Quality Management District Air Quality Management Plan

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

San Bernardino County Regional Greenhouse Gas Reduction Plan

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

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

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

Conclusion

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

4.12 Mineral Resources

Threshold 4.12 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✓

Threshold 4.12 a): Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact

The naturally occurring mineral resources within the Planning Area include sand, gravel or stone deposits that are suitable as sources of concrete aggregate. The Project site has been designated with a Mineral Land Classification of MRZ-3A, which is an area containing known mineral occurrences of undetermined mineral resource significance. This classification was based on a report by the California Department of Conservation, Division of Mines and Geology, entitled Mineral Land Classification of Concrete Aggregate Resources in the Barstow - Victorville Area, San Bernardino County, California. A review of the California Department of Conservation interactive web mapping indicates there are no active mines on Project site.[26] In addition, a review of the California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the Project site.[27]

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

26 https://maps.conservation.ca.gov/mineralresources/, accessed on November 2, 2024.
27 California, State of. Department of Conservation. California Oil, Gas, and Geothermal Resources Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/, accessed on November 2, 2024.

Threshold 4.12 b): Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact

The Project site is not being used for mineral resource recovery. The Project site is designated as Single Family Residential (R-S5). If the Project site were intended for mineral recovery, it would be designated as such, and not residential. As such, the Project is not delineated on the General Plan, a specific plan, or other land use plan as a locally important mineral resource recovery site.

4.13 Noise

Threshold 4.13 Would the Project result in:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b) Generation of excessive ground-borne vibration or groundborne noise levels?			✓	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✓	

Threshold 4.13 a): Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact

Methodology

In California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal. 4th 369, Case No. S213478, the California Supreme Court stated "In light of CEQA's text, statutory structure, and purpose, we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions." Notwithstanding "special CEQA requirements [that] apply to certain airport, school and housing construction projects [,]" the Court held "that ordinary CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on projects and its users or residents.

Exceptions to this are housing projects for agricultural workers, affordable housing, and transit priority projects (a type of development that is either 100% residential or a mixed-use

development (where 50% of the project is residential), that has a floor area ratio (ratio of total building square footage to total lot square footage) of 0.75, a minimum net density of at least 20 dwelling units per acre).

Moreover, special CEQA requirements apply to certain airports, schools, and housing construction projects. In such situations, CEQA requires agencies to evaluate a project site's environmental conditions regardless of whether the project risks exacerbating existing conditions. The environmental review must consider—and a negative declaration or exemption cannot be issued without considering—how existing environmental risks such as noise, hazardous waste, or wildland fire hazard will impact future residents or users of a project. That these exceptions exist, however, does not alter our conclusion that ordinary CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents.

Existing Ambient Noise Levels

The Project site is in a partially developed area of the City and currently does not generate noise. The existing noise environment in the Project area is characterized by the area's general level of development. The Project is located in a partially developed with residential uses. Ambient noise levels are therefore increased as a result of roadway traffic, and other human activities. Table 4.13-1 summarizes typical ambient noise levels based on level of development. Given the rural nature of the proposed Project area, baseline ambient noise levels are assumed to be approximately 40-50 Ldn.

Table 4.13.1: Population Density and Associated Ambient Noise Levels

Population Density	dBA, Ldn
Rural 40-50	40-50
Small town or quiet suburban residential	50
Normal suburban residential	55
Urban residential	60
Noisy urban residential	65
Very noisy urban residential	70
Downtown, major metropolis	75-80
Area adjoining freeway or near major airport	80–90

Notes: dBA = A-weighed decibels; Ldn = day-night level
Source: Draft Initial Study / Mitigated Negative Declaration Silver Peak Solar Project, February 24, 2022.

Short-term Construction Noise Impact Analysis

The most significant source of short-term noise impact resulting from the Project is related to noise generated during construction activities on the Project site. Construction is performed in discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. Thus, noise levels will fluctuate depending on the construction phase, equipment type, duration of equipment use, the distance between the noise source and receptor, and the presence or absence of noise attenuation structures. As shown on Table 4.13.2 below, noise

levels generated by heavy construction equipment can range from approximately 75 dBA to 99 dBA when measured at 50 feet.

Table 4.13.2: Typical Construction Equipment Noise Levels

Type of Equipment	Range of Sound Levels Measured (dBA at 50 feet)
Pile Driver	81 to 96
Rock Drills	83 to 99
Jack Hammers	75 to 85
Pneumatic Tools	78 to 88
Pumps	68 to 80
Dozers	85 to 90
Tractors	77 to 82
Front-End Loaders	86 to 90
Graders	79 to 89
Air Compressors	76 to 86
Trucks	81 to 87

Source: "Noise Control for Buildings and Manufacturing Plants", Bolt, Beranek & Newman, 1987.

Construction noise will have a temporary or periodic increase in the estimated 51 dBA ambient noise level above the existing within the Project vicinity. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during the grading phase from the use of a bulldozer, which at 50 feet ranges from 85 to 90 dBA. For every doubling of distance, the sound level reduces by 6 dBA. Noise generation related to construction activities is addressed in §17.90.020(d) of the Zoning Ordinance which requires construction projects to list general noise reduction practices as "General Notes" on the construction drawings as part of the Project's conditions of approval (COA). These mandatory conditions are described as follows.

17.90.020 (d) Construction Practices

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

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

(2) Stationary construction equipment that generates noise in excess of sixty-five (65) dBA at the project boundaries must be acoustically shielded and located at least one hundred feet (100') from occupied residences. The equipment area with appropriate

acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities.

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

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

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

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

With the implementation of the above standard conditions of approval, construction noise impacts would be less than significant.

Operational Noise Analysis

Sound levels generated by single-family residential activities are:

- Normal conversation, air conditioner= 60 dBA
- Gas-powered lawnmowers and leaf blowers = 80-85 dBA
- Motorcycle = 95 dBA
- Very loud radio, stereo, or television =105–110 dBA
- Shouting or barking in the ear = 110 dBA[28]

The USEPA identifies noise levels affecting health and welfare as exposure levels over 70 dBA over a 24-hour period. Noise levels for various levels are identified according to the use of the area. Levels of 45 dBA are associated with indoor residential areas, hospitals, and schools, whereas 55 dBA is identified for outdoor areas where typical residential human activity takes place. According to the USEPA levels of 55 dBA outdoors and 45 dBA indoors are identified as levels of noise considered to permit spoken conversation and other activities such as sleeping, working, and recreation, which are part of the daily human condition.[29] Levels exceeding 55 dBA in a residential setting are normally short in duration and not significant in affecting health and welfare of residents.

The primary increase in noise will be the result of adding vehicle traffic generated by the Project to Seneca Road, Aster Road, and Palmdale Road. The level of traffic noise depends on three primary factors: (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed Project does not propose any uses that would require a

28 Center for Disease Control, "*Loud Noise Can Cause Hearing Loss*". https://www.cdc.gov/hearing-loss/about/?CDC_AAref_Val=https://www.cdc.gov/nceh/hearing_loss/default.html, accessed on November 2, 2024.

29 USEPA "EPA Identifies Noise Levels Affecting Health and Welfare" https://www.epa.gov/archive/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html accessed November 2, 2024.in a residential setting are normally short in duration and not significant in affecting health and welfare of residents.

substantial number of truck trips, and the proposed Project would not alter the speed limits that will be established.

Off-Site Traffic Noise Analysis

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

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

Volume of Traffic

Traffic generated by the Project will take access from Hampton Lane, which connects to Seneca Road to the north, which then provides east-west access to the City's arterial roadway system including Highway US 395, Palmdale Road (SR18) Under current conditions, the average daily trips on Hampton Lane are shown in Table 4.13.3.

Table 4.13.3: Hampton Lane Existing Traffic Volumes

Street	Number of Dwelling Units	Average Daily Trips* (ADT)	Project Traffic	Total
San Andreas Court	11	106	---	106
San Marcos Court	14	134	---	134
Saddleback Drive	14	67	77	144
Vanesa Court	14	67	115	182
Francis Court	14	134	115	249
Colten Ridge Street	20	96	115	211
Total	87	604	422	1,026

* Institute of traffic Engineers (ITE) Code 210 Single Family Detached Housing 9.6 ADT/dwelling unit.

According to Caltrans, the human ear is able to begin to detect sound level increases of 3 decibels (dB) in typical noisy environments[30]. A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable. As indicated in Table 4.13 .3, implementation of the Project will increase traffic volumes in the area but not to the extent that traffic volumes will be doubled creating a +3dBA noise increase or result in a perceivable noise increase. Therefore, operational noise impacts would be less than significant.

[30] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/traffic-noise-protocol-april-2020-a11y.pdf

The Project is forecasted to generate 422 daily vehicle trips.[31] According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.[32] A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable. As shown in Table 4.13.3 above, the Project would increase the daily trips in the immediate area by 70%.

However, the anticipated increased traffic would not result in a doubling (100% increase) of the daily vehicle traffic to be generated in the area. Therefore, the proposed Project traffic would not result in a substantial permanent increase in ambient roadway noise levels. Noise impacts created by the Project would be less than significant and mitigation is not required.

Speed of Traffic

The speed limit of the roadways around the Project site are subject to a prima facie limit of 25 mph under the vehicle code. These low levels of speeds do not result in vehicles generating high levels of noise.

Number of Trucks in the Flow of the Traffic

The Project is a residential development, and it will not routinely generate noise from large trucks.

Conclusion

Through compliance with mandatory requirements to reduce noise during construction, the Project's construction noise impacts will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project. In addition, as shown above, the Project's operational noise would not be significant either.

Threshold 4.13 b): Would the project result in generation of excessive ground borne vibration or groundborne noise levels?

Less Than Significant Impact

Groundborne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. The Project does not involve the use of heavy trucks, so vehicle traffic generated by the Project will not generate excessive ground-borne vibration.

According to the Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018,[33] while ground vibrations from construction activities do not often reach the levels that can damage structures, construction vibration may result in building damage or prolonged annoyance from activities such as blasting, piledriving, vibratory

31 ITE Trip Generation Manual, 11th Edition. Land Use Code 210 (9.43 trips per unit).
32 Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.
33 https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed March 3, 2025

compaction, demolition, and drilling or excavation near sensitive structures. The Project does not require these types of construction activities.

Threshold 4.13 c): For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact

The Project site is approximately 5 miles southwest of Southern California Logistics Airport. According to San Bernardino Countywide Plan Policy Map HZ-9, Airport Safety and Planning Areas, the Project site is not located within an area exposed to excessive noise levels.[34]

34 https://countywide.sbcounty.gov/wp-content/uploads/sites/122/2021/02/HZ-9-Airport-Safety-Planning-201027.pdf?x23421, accessed on November 2, 2024.

4.14 Population and Housing

Threshold 4.14 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			✓	

Threshold 4.14 a): Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact

Population Growth

As proposed, the Project has a density of 4.78 du/ac. According to the 2020 population estimates prepared by the California Department of Finance, there are 3.89 persons per household in Adelanto.[35] Under the existing land use designation of R-S5, the maximum number of dwellings allowed would be 50 with a potential population of 194 persons. The Project proposes 48 dwelling units with a potential population of 187 persons. Thus, the Project's potential population is less than allowed by the General Plan.

Based on the population estimates prepared by the Southern California Association of Governments (SCAG) for Adelanto, the population of Adelanto is forecast to be 70,000 persons in 2040. As shown in Table 4.14.1 below, the potential population is in line with the SCAG forecast. As such, adequate land development capacity is available to accommodate the anticipated growth in the City.

35 E-5 Population and Housing Estimates for Cities, Counties, and the State, https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/ accessed on November 4, 2024.

Table 4.14.1: SCAG Population Forecast Compared to Actual Population

	2012	2020	2022	2035	2040
SCAG Population Forecast	31,100	37,600	---	61,900	70,000
Actual Population	31,263	35,652	36,357	---	---

Sources: 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction: https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071, accessed November 2, 2024, and State of California E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark, https://dof.ca.gov/forecasting/Demographics/estimates/estimates-e5-2010-2020/, accessed November 2, 2024.

Infrastructure Extensions

Although the Project site is in a relatively undeveloped area, it is adjacent to existing residential development. Access is currently provided by paved residential neighborhood roads within the right-of-way for Saddleback Drive, Vanessa Court, Francis Court, and Colton Ridge Street. The Project would connect to the existing 8-inch-diameter waterline located adjacent to the east in Saddleback Drive, Vanessa Court, Francis Court, and Colton Ridge Street. The Project would connect to the existing 8-inch-diameter sewer line in Saddleback Drive, Vanessa Court, Francis Court and Colton Ridge Street adjacent to the Project site to the east. Gas and electricity are available in the vicinity of the Project site. No additional infrastructure will be needed to serve the Project other than to improve the existing dirt roads and connect to infrastructure near the site.

Threshold 4.14 b): Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact

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

4.15 Public Services

Threshold 4.15 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

Threshold 4.15 a): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1) **Fire protection?**
2) **Police protection?**
3) **Schools?**
4) **Parks?**
5) **Other public facilities?**

Less Than Significant Impact

Fire Protection

The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by the Adelanto Station #322, an existing station located approximately 3.9 roadway miles north of the Project site at 10370 Rancho Road. Development of the Project would impact fire protection services by placing additional demand on existing County Fire Department resources should its resources not be augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access.

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

Police Protection

The San Bernardino County Sheriff's Department provides community policing to the Project area via the Victor Valley Sheriff Station located at 11613 Bartlett Street in Victorville. Because the Project site is in an area near development, it would be routinely patrolled by the Sheriff's Department. The City collects a Development Impact Fee to assist the City in providing capital improvement costs for police protection facilities. Payment of the Development Impact Fee would be applied to police facilities and/or equipment, to offset the incremental increase in the demand for police protection services that would be created by the Project. Therefore, the Project would not result in the need to construct new or physically altered police facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police protection.

Schools

Adelanto is served by two school districts: Adelanto Elementary School District, which provides elementary and middle school services throughout the City, and the Victor Valley Union High School District, which operates Adelanto High School. The nearest schools to the Project site are Columbia Middle School, (0.4 miles), Adelanto High School (1.9 miles), Donald E. Bradach Elementary School (2.9 miles), and Victoria Magathan Elementary School (3.8 miles).

Based on 48 dwelling units, the Project is forecast to generate 29 students shown in Table 4.15.1, Student Generation Factors.

Table 4.15.1: Student Generation

School Level	Student Generation Factor[1,2]	Number of Students
Elementary School	0.3366	16
Junior High School	0.1008	5
High School	0.1571	8
Total	**–**	**29**

Notes:
1. Elementary and Junior High School generation rates are based upon the Adelanto Elementary School District, School Facilities Justification Report, June 29, 2021.
2. High School student rate is based upon the Victor Valley Union High School District, Residential and Commercial/Industrial Development School Fee Justification Report, October 3, 2024.

Both school districts are authorized by state law (Government Code §65995) to levy a new construction fee per square foot of residential construction for the purpose of funding the

reconstruction or construction of new school facilities. Pursuant to Section §65995(3) (h) of the California Government Code, the payment of statutory fees is "*deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities.*" Therefore, the payment of school impact fees for residential development would offset the potential impacts of increased student enrollment related to the implementation of the Project.

Parks

The nearest public park to the Project site is John Mgrdichian Park, which is located approximately 1.10 miles to the east. The City of Adelanto requires dedication of land, payment of fees in-lieu of parkland dedication, or a combination thereof at a rate of three acres of parkland per 1,000 residents for proposed residential subdivisions, pursuant to Adelanto Municipal Code Chapter16.52. Based on 48 dwelling units, the Project could increase the overall population of the City by 171 persons (assuming all new residents will come from outside the city limits). 187 residents would result in the need of approximately 0.25 acres of parkland. Payment of the in-lieu fee would ensure that the Project will not result in a significant impact with respect to parkland.

Other Public Facilities

As noted above, the development of the Project could result in a direct increase in the population of persons. The current population of the City is 38,187 (assuming all new residents of the Project came from outside the City). As such, the Project would result in a 0.02% increase in population. It is not anticipated the Project would increase the demand for public services, including public health services and library services to the degree that the construction of new or expanded public facilities would be required based on this small increase in population.

In addition, the Project would be required to comply with the provisions of Municipal Code Chapter 3.75 which require payment of the Development Impact Fee to assist the City in providing public services. Payment of the Development Impact Fee would ensure that the Project provides fair share of funds for additional public services. These funds may be applied to the acquisition and/or construction of public services and/or equipment.

4.16 Recreation

Threshold 4.16 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			✓	

Threshold 4.16 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?

Less Than Significant Impact

The nearest public park to the Project site is John Mgrdichian Park, which is located approximately 1.1 miles to the east. The Project could result in the increased use of existing parks and recreation facilities. Substantial deterioration of existing facilities could occur if the level of usage intensifies significantly, and the maintenance of affected facilities does not keep pace with intensified use, and additional park facilities are not provided to meet existing and increased demand.

As noted under Threshold 4.14(a) above, the development of the Project could result in an increase in the population of 187 persons (1.7% increase). This small amount of population increase is not anticipated to increase the use of existing neighborhood and regional parks or other recreational facilities to the degree that substantial physical deterioration of recreational facilities would occur or be accelerated.

In addition, the City of Adelanto requires the dedication of land, payment of fees in lieu of parkland dedication, or a combination thereof at a rate of three acres of parkland per 1,000 residents for proposed residential subdivisions, pursuant to Adelanto Municipal Code Chapter *16.52*. Compliance with this mandatory requirement will ensure that the Project will not result in a significant impact with respect to recreational facilities.

Threshold 4.16 b): Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than Significant Impact

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

4.17 Transportation

Threshold 4.17 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			✓	
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?			✓	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d) Result in inadequate emergency access?			✓	

Threshold 4.17 a): Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact

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

Roadway Facilities

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

In October 2020, the City adopted the Adelanto Active Transportation Plan. Adelanto in Motion, An Active Transportation Plan ("Plan") which represents a new commitment to walking and biking in Adelanto. There are no bicycle or pedestrian projects proposed adjacent to the Project site. Thus, the Project would not interfere with the proposed bicycle and pedestrian facilities planned elsewhere in the City. However, the Project would construct streets that meet City standards that provide sidewalks and pavement that would accommodate bicycle travel.

Public Transit Facilities

Public transportation services within the City of Adelanto and near the proposed Project are provided by the Victor Valley Transit Authority (VVTA). The closest connection points to the VVTA transit system are Route No. 31 (Seneca Road and Verbena Road) and No. 33 (Seneca Road and Bellflower Street), located approximately 1.4 miles east on Seneca Road. The Project is not proposing any improvements that would conflict with Route No. 33, or any future transit route in the area.

Conclusion

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

Threshold 4.17 b): Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Less Than Significant Impact

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA.

The City of Adelanto City Council adopted Resolution No. 20-41 on June 24, 2020, which approved VMT thresholds for CEQA compliance purposes. Additionally, the City augmented the adopted VMT Thresholds by stipulating that the following types of projects would result in less than significant VMT impacts because they generate less than 3,000 metric tons of CO2e per year of GHG emissions:[36]

- Single Family – 117 Dwelling Units
- Multi Family Low Rise (Up to 2 levels) – 150 Dwelling Units
- Multi Family Mid Rise (between three and 10 levels) – 222 Dwelling Units
- General Office Building – 342,000 square feet
- Retail – 135,000 square feet
- High Cube Short Term Transload Warehouse – 413,000 square feet
- Warehousing
- (Unrefrigerated) – 306,000 square feet
- Industrial– 256,000 square feet
- Project GHG emissions of less than 3,000 Metric Tons of Carbon Dioxide Equivalent (CO2e) as determined by a methodology acceptable to the City. Use of project

[36] City of Adelanto City Council Resolution No. 20-41A.

specific trip lengths from SBTAM and resulting GHG data from CalEEMod runs are acceptable; or

- Unless specified above, project trip generation is less than 110 trips per day per ITE Manual or other acceptable source determined by the City. This was based on standard warehousing use in CalEEMod which uses a higher trip generation rate than High-Cube Transload And Short-term Storage Warehouse but uses a higher truck percentage, presenting a conservative analysis. CalEEMod restricts light industrial uses to 50,000 square feet. This analysis is based on Heavy Industrial which is a more conservative approach due to a higher trip generation and higher truck trips associated with heavy industrial uses.

Threshold 4.17 c): Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact

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

Threshold 4.17 d): Would the project result in inadequate emergency access?

Less Than Significant Impact

As shown on the Project site plan, the Project would develop the residential streets identified as Saddleback Drive, Vanessa Court, Francis Court, and Colten Ridge Street as extensions of the existing roads adjacent to the east of the Project site by City standards. Emergency access would be available from these streets connected to the citywide circulation system. During the preliminary review of the Project, the Project's transportation design was reviewed by the City's Engineering Department, Fire Department, and Sheriff's Department to ensure that adequate access to and from the site would be provided for emergency vehicles.

4.18 Tribal Cultural Resources

Threshold 4.18 Would the project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?		✓		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		✓		

Threshold 4.18: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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 §5020.1(k)?

Less Than Significant With Mitigation Incorporated

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

(a) "Tribal cultural resources" are either of the following:
  (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
  (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision

(c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

California Register of Historical Resources/Local Register of Historical Resources

A historical resource or archaeological resource may also be a tribal cultural resource if it conforms with the criteria described in Public Resources §21084 (a) above. As discussed in Section 4.5, Cultural Resources, based on records search and a pedestrian field survey, no historic or archaeological resources eligible for listing on the California Register of Historical Resources or a local register were encountered on the surface of the Project site. However, grading, utility trenching, and the construction of the water quality basin have the potential to reveal buried deposits below the surface. Therefore, Mitigation Measures CR-1 and CR-2 under Section 4.5, Cultural Resources shall apply. These measures require that the Yuhaaviatam of San Manuel Nation (YSMN) 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 discovery, to provide Tribal input with regards to significance and treatment. In addition, if significant pre-contact cultural resources, as defined by CEQA, are discovered, and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment.

Threshold 4.18: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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 subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact With Mitigation Incorporated

Sacred Lands File Search

A Sacred Lands File request was sent by BCR Consulting to the State of California Native American Heritage Commission (NAHC) for a records search. The NAHC is the State of California's trustee agency for the protection of "tribal cultural resources," as defined by California Public Resources Code §21074 and is tasked with identifying and cataloging properties of Native American cultural value, including places of special religious, spiritual, or social significance and known graves and cemeteries throughout the state. In response to BCR Consulting's inquiry, the Native American Heritage Commission stated in a letter dated March 7,

2022, that the Sacred Lands File yielded negative results for Native American cultural resources in the vicinity of the project area.

Assembly Bill (AB) 52

The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect July 1, 2015. AB 52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. The City commenced the AB 52 process by sending out consultation invitation letters to the following tribes who previously requested notification pursuant to Public Resources Code §21080.3.1.

- Morongo Band of Mission Indians
- Yuhaaviatam of San Manuel Nation (YSMN) (formerly San Manuel Band of Mission Indians)
- Agua Caliente Band of Cahuilla Indians

The Yuhaaviatam of San Manuel Nation (YSMN) indicated that the Project site is located within Serrano ancestral territory and, therefore, is of interest to the YSMN. As a result of the consultation between the YSMN I and the City, Mitigation Measures TCR-1 and TCR-2 are made a part of the project/permit/plan conditions.

MM TCR-1: Contact Yuhaaviatam of San Manuel Nation. The Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department shall be contacted, as detailed in MM CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regard to significance and treatment. If the find is 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, if YSMN elects to place a monitor on-site.

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

Note: Yuhaaviatam of San Manuel Nation realizes that there may be additional tribes claiming cultural affiliation to the area; however, Yuhaaviatam of San Manuel Nation can only speak for itself. The Tribe has no objection if the agency, developer, and/or archaeologist wishes to consult with other tribes in addition to YSMN and if the Lead Agency wishes to revise the conditions to recognize additional tribes.

4.19 Utilities and Service Systems

Threshold 4.19 Would the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		✓		
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple years?			✓	
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste more than State or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Threshold 4.19 a): Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact With Mitigation Incorporated

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

Water Service

The Project will connect to the existing 8-inch diameter waterline located adjacent to the east of the project site. The connection will be within the existing residential roadways and directed to Seneca Road.

Sewer Service

The Project will connect to the existing 8-inch diameter sewer lines in the adjacent residential roads Saddleback Road, Vanessa Court, Francis Court, and Colten Ridge Street adjacent to the Project site.

Storm Drainage Improvements

The proposed condition is to utilize 18" storm drains to direct storm flow toward a 1.29 acre feet capacity basin identified as Lot A on TTM20723, and a 36" storm drain in Saddleback Drive. Multiple storm drains control flood routing for the site. The design will incorporate controlled basin outlets throughout the site. This approach will maintain the existing drainage patterns. The site run-off has been routed to the basin using the streets and typical surface collection facilities for water quality and flood control.

Electric Power Facilities

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

Natural Gas Facilities

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

Telecommunication Facilities

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

Conclusion

Construction or installation of utilities and service systems may impact Biological Resources, Cultural Resources, Paleontological Resources, and Tribal Cultural Resources. Mitigation Measures BIO-1 through BIO-7, CR-1, PALEO-1, PALEO-2, TCR-1 and TCR-2 are required.

Threshold 4.19 b): Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple years?

Less than Significant Impact

The Project would be served with potable water by the Adelanto Public Utility Authority. The City's 2020 Urban Water Management Plan, revised August 25, 2021, indicates the gallons per capita water use at 116 gallons per day per capita (GPCD).[37] The Project is estimated to increase the population by approximately 187 persons, which would create an additional water demand of 21,692 gallons per day (21.9 acre-feet per year).

Adelanto has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.[38] The Mojave Basin Area was the subject of a court-ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. The court-ordered adjudication of the Mojave Basin Area allocates a variable Free Production Allowance (FPA) to each purveyor that supplies more than 10 AFY, including Adelanto.

Each allocated FPA represents the purveyor's share of the water supply available from the MWA Subarea. FPAs are determined as a percentage of the purveyor's highest verified annual use from 1986 to 1990. The FPA, which is currently set at 80 percent of the Base Annual Production (BAP) for agriculture and 60 percent of BAP for municipal and industrial and industrial producers, can vary from year to year depending on the Watermaster's safe yield projections for the Basin. If Adelanto, or another purveyor, pumps more than its allotted FPA in any year, they are required to purchase replacement water equal to the amount of production in excess of the FPA. Replacement obligations are satisfied by paying MWA and then purchasing unused FPA within the subarea.

Pursuant to paragraph 24(o) of the Judgment After Trial dated January 10, 1996, the Watermaster is required to make a recommendation to the Court for adjusting the FPA of each Subarea, if necessary. The City is located within the Alto Subarea. Based on the most recent annual report dated May 1, 2024, the FPA in Alto Subarea is within 5% of the Projected Safe Yield (PSY) of BAP (1.3%). Municipal and Industrial producers' FPA is within 5% of the indicated PSY at the current level of 55%. However, it is proposed that the FPA for the Alto Subarea be reduced by 1.9% to 53.3% for Water Year 2024-25. As noted above, FPA is within 5% (percentage of BAP) of PSY, and thus, the Watermaster is not compelled to recommend ramp down.[39]

37 Adelanto 2020 Urban Water Management Plan, August 25, 2021, p. 5-4, accessed on November 8, 2024.
38 Adelanto 2015 Urban Water Management Plan, June 6, 2016, p. 23.
39 Mojave Area Basin Watermaster, available at: Watermaster https://www.mojavewater.org/wp-content/uploads/2024/04/30AR2223.pdf Annual Report for Water Year 2022-23 accessed on November 8, 2024.

Conclusion

Based on the analysis above, the Project's water demand of 21.9-acre feet per year can be accommodated by the Adelanto Public Utility Authority during normal, dry, and multiple years.

Threshold 4.19 c): Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact

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

Municipal wastewater is generated in Adelanto's service area from a combination of residential, commercial, and industrial sources. The quantities of wastewater generated are generally proportional to the population and water usage in the service area. It is estimated that Adelanto's customers generate wastewater roughly proportional to 60 to 70 percent of the City's water demand. Based on 21,692 gallons per day using a 70% wastewater-to-water calculation, the Project is estimated to generate 15,184 gallons or 0.018 MGD of wastewater per day.

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

Threshold 4.19 d): Would the project generate solid waste more than State or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact

Construction Related Impacts

The California Green Building Standards Code ("CAL Green') requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods. The City of Adelanto Building and Safety Department reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CAL Green solid waste requirements.

Operational Related Impacts

The Project is estimated to generate 98 tons of solid waste per year.[40] The amount of estimated solid waste generated by the Project is derived from the California Emissions Estimator Model, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model also quantifies the amount of solid waste generated by a project. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses.

Solid waste may ultimately be disposed of at various landfills, the closest landfill to the Project site is the Victorville Sanitary Landfill located at 18600 Stoddard Wells Road, approximately 10.5 miles to the northeast. According to the CalRecycle website, the Victorville Sanitary Landfill has a daily throughput of 3,000 tons per day and a remaining capacity of 79,400,000 cubic yards. The expected closure is October 1, 2047.[41] As such, there is adequate landfill capacity to serve the Project.

Threshold 4.19 e): Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact

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

40 Appendix A-TTM20723 CalEEMod Data Sheets.
41 https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/2652 , accessed on November 3, 2024.

4.20 Wildfire

Threshold 4.20 If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

Threshold 4.20: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact

Wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and

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

According to the *California Fire Hazard Severity Zone Viewer* maintained by Cal Fire, the Project site is not located within a high wildfire hazard area.[42] The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, Thresholds 4.20(a) through 4.20(d) require no response.

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of a wildfire.
- 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 on the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes.

42 https://www.fire.ca.gov/osfm/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022, accessed on March 3, 2025.

4.21 Mandatory Findings of Significance

Threshold 4.21 Does the Project	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓		
c) Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?			✓	

Threshold 4.21 a): Does the project have the potential to 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, 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?

Less Than Significant Impact With Mitigation Incorporated

As indicated in this Initial Study, Biological Resources, Cultural Resources, Soils and Geology, and Tribal Cultural Resources may be adversely impacted by Project development. The following measures are required to reduce impacts to less than significant levels:

- BIO-1: Pre-Construction Sensitive Plant Clearance Survey
- BIO-2: Western Joshua Tree Incidental Take Permit.
- BIO-3: Wildlife Inventory
- BIO-4: Nesting Bird Survey

- BIO-5: Desert Tortoise Pre-Construction Survey
- BIO-6: Pre-Construction Mohave Ground Squirrel Survey
- BIO-7: Crotch's Bumble Bee Habitat Assessment

- CR-1: Resource Discovery
- CR-2: Monitoring and Treatment Plan

- PALEO-1: Inadvertent Discovery of Paleontological Resources
- PALEO-2: Paleontological Treatment Plan

- TCR-1: Contact Yuhaaviatam of San Manuel Nation
- TCR-2: Tribal Cultural Documents

Threshold 4.21 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)?

Less Than Significant With Mitigation Incorporated

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

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

Biological Resources

As discussed in Section 4.4, Biological Resources, of this Initial Study, future development of the site will impact the general biological resources present on the site, and most of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. More mobile species (i.e., birds and large mammals) will be displaced into adjacent areas and will likely experience minimal impacts.

Although wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service were not detected, the project site is located within the range of the Burrowing Owl, Mojave Ground Squirrel, Desert Tortoise, and Nesting Birds. Therefore, Mitigation Measures BIO-1 through BIO-7 are included to ensure any impacts are less than significant to these species.

Overall, the loss of about 10.05 acres of disturbed desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitats throughout the surrounding desert region. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Cultural Resources

As discussed in Section 4.5, Cultural Resources, of this Initial Study, the records search and field survey did not identify any historical resources or unique archaeological resources within the Project site boundaries. Research results, combined with surface conditions have failed to indicate sensitivity for buried cultural resources. No additional cultural resources work, or monitoring is necessary during the proposed activities associated with the development of the earthmoving activities. If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation, if necessary, as required by Mitigation Measure CR-1, and a Monitoring and Treatment Plan be prepared as required by Mitigation Measure CR-2.

Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Geology and Soils (Paleontological Resources)

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

Tribal Cultural Resources

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

Utilities and Service Systems

As discussed in Section 4.19, Utilities and Service Systems, of this Initial Study, the installation and construction of the sewer, water, and storm drainage facilities described below will result in earth moving that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. Potential impacts to these resources are mitigated by Mitigation Measures BIO-1 through BIO-7, CR-1, PALEO-1 and PALEO-2, and TCR1 through TCR-2. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

Threshold 4.21 b): Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact

As indicated by this Initial Study, the Project will not result in potentially significant environmental impacts that directly affect human beings (i.e., Air Quality, Agriculture and Forestry Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Recreation, Transportation, and Utilities and Service Systems.