

Environmental Checklist Form

| | |
|---|--|
| Project title: | Ofland Hotel Twentynine Palms Project #24001838: General Plan Text and Map Amendment, Development Code Text Amendment, Conditional Use Permit, CUP24-000003, GPA24-000002, REZ25-000001 and DCA25-000004 |
| Lead agency name and address: | City of Twentynine Palms 6136 Adobe Road Twentynine Palms, CA 92277 |
| Contact person and phone number: | Keith Gardner, Planning Department 760-367-6799 x 1008 kgardner@29palms.org |
| Project location: | Southeast corner of Lear Avenue and Twentynine Palms Highway, Twentynine Palms, CA, 92277 |
| Project sponsor's name and address: | Ofland Development 4605 Post Oak Place Drive, Suite 280 Houston, TX 77027 |
| Existing General Plan and Zoning designation: | Single-Family Residential Estate (RS-E) |

1. INTRODUCTION

The purpose of this Initial Study (IS) is to disclose and evaluate the environmental impacts resulting from the construction and operation of the proposed Ofland Hotel Twentynine Palms (Project). The City of Twentynine Palms received applications for a General Plan Amendment (GPA) and Rezone (REZ), Development Code Amendment (DCA), and Conditional Use Permit (CUP) from Ofland Hotels (Applicant) for the 152-acre luxury resort project located at the southeast corner of Lear Avenue and Twentynine Palms Highway, in the City of Twentynine Palms, California. The applications are referred to as the "Project" in this document. Specifically, the applications consist of:

1. A General Plan Amendment (GPA) to create the Open Space Conservation land use designation, and applying the designation to the Project site on the land use and zoning map (REZ).
2. A Development Code Amendment (DCA) to create the Open Space Conservation zone, including development standards.
3. A Conditional Use Permit (CUP) to allow the development of the hotel on the Tourist Commercial portion of the property.

This document has been prepared pursuant to the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Sections 15000 et seq.). The City of Twentynine Palms will serve as the lead agency for CEQA purposes.

Project Location

The Project is proposed on an undeveloped and vacant parcel approximately 152-acres in size, located at the southeast corner of Lear Avenue and Twentynine Palms Highway, in the City of Twentynine Palms, San Bernardino County, California (APN 0614-121-15). (Exhibits 1-3).

The proposed site is currently designated “Single-Family Residential-Estate” (RS-E) on the City’s General Plan Land Use and Zoning Map (see Exhibit 5). The RS-E designation allows for low-density single-family residential development with a maximum density of 1 dwelling unit per 2.5 acres.

Lands to the north, beyond the Highway 62 right-of-way, are designated Rural Living, 2.5-acre minimum; Lands to the south are designated Rural Living, 5-acre minimum; land to the west is designated Single Family Residential, 4 units per acre; and land to the east is designated Single Family Residential, Estate, 2.5-acre minimum.

Project Description

The Ofland Hotel (Project) proposes the development of a luxury resort with 100 units and amenities including two lodges, pools and spas, recreational areas, playgrounds, food and beverage services, and 25 employee housing units (see Exhibit 4). The Project may be developed in two phases. However, this Initial Study analyzes build out of the Project, and as a result considers the “worst case” impacts of the Project.

Each unit (100 units) will be approximately 384 square feet (SF) with an outdoor patio for a total of 38,400 SF. The main lodge is 4,590 SF located near the center of the campgrounds, and includes pool and spa, lounge areas, retail space, offices, food and beverage space, restrooms and changing areas. The secondary lodge is 1,800 SF located north of the main lodge and includes a pool, lounge space, restrooms and changing areas. Other recreational space includes an outdoor movie screen approximately 16 ft in height with an outdoor seating area, a stargazing area, gathering space, a garden, and playground area.

The 25 employee housing units will be sited in three buildings totaling 5,945 SF located at the southwest quadrant of the property. The units will be a mix of manager suites and split units and include a shared community room and kitchen. Employee housing includes one general manager suite with private living space and restroom, six manager suites with private restrooms, and 18 split employee units with one shared restroom per two units.

Back of house facilities total 3,575 SF and include housekeeping storage and laundry room, and maintenance and equipment room. The Project also includes a private wastewater treatment package plant to provide on-site wastewater treatment service totaling 100 SF that will be located approximately 300 feet north of the northernmost unit.

The Project will be constructed in two phases. Phase 1 includes 75 units, the main lodge, and 19 employee housing units. Phase 2 includes the remaining 25 units, secondary lodge, and 6 employee housing units.

Access and Circulation

The Project proposes two access points that will require roadway improvements along Lear Avenue and Sullivan Road. The main entrance will be from Lear Avenue approximately 275 north of Cactus Drive, and the secondary access point will be from Sullivan Road approximately 550 feet east of Lear Avenue. The main entrance will be primarily for guests of the hotel, and the secondary access will be for employees and emergency access. A total of 132 parking spaces are provided on-site, including 6 ADA compliant spaces, 6 electric vehicle (EV) charging spaces and 19 EV capable spaces.

The extension and improvement of Lear Avenue south to Sullivan Road, approximately 0.5 miles in length, and Sullivan Road east from Lear Avenue to the secondary driveway, approximately 550 feet in length, is required to adequately service the site. All access and internal driveways will be paved with asphalt concrete. Within the campground, a pedestrian/golf cart trail network will be used to access units and all recreational facilities.

Applications

The 152-acre site is currently designated "Single-Family Residential-Estate" (RS-E) on the City's General Plan Land Use and Zoning Map. The RS-E designation does not permit the proposed uses. The proposed GPA and corresponding DCA and REZ (land use and zoning map and text amendment) would change the designation for 42± acres in the center of the parcel to Tourist Commercial (CT), and 110± acres on all sides of the property to Open Space Conservation (OSC), a new designation that assures preservation of land in its native condition, as shown in Exhibit 6. The Open Space designation would form a buffer on all sides of the parcel, as follows:

- 500 feet in depth along the west side of the parcel;
- 800 feet in depth along the east side of the parcel;
- 600 feet in depth along the north side of the parcel; and
- 500 feet in depth along the south side of the parcel.

The GPA and DCA would allow the development of the proposed hotel, employee housing units, on-site recreation and similar supporting facilities within the central Tourist Commercial core. Lands to be designated under the Open Space designation would remain in their current natural condition, and would be preserved in this condition in perpetuity with the exception of access roadways and the wastewater treatment plant.

The CUP is to allow the proposed hotel and associated outdoor recreational uses to operate within the CT designation and to review the design of the Project.

SB 330: No Net Loss

On October 9, 2019, Gov. Gavin Newsom signed the Housing Crisis Act of 2019 (HCA) into law, commonly known as Senate Bill 330 (SB 330) to respond to the California housing crisis. Senate Bill (SB) 330 prohibits local jurisdictions from enacting new laws that would have the effect of reducing the legal limit on new housing within their borders or delay new housing via administrative or other regulatory barriers. On September 16, 2021, Senate Bill 8 (SB 8) was signed into law which made some clarifications and updated SB 330, extending the HCA from January 1, 2025 to January 1, 2030.

To comply with SB 330, the city must demonstrate that the proposed GPA on the 152-acre site designated Single-Family Residential-Estate, with a potential for 61 residential units, to non-residential uses would result in “no net loss” of potential housing units within city boundaries.

Twentynine Palms is currently in the process of preparing an Environmental Impact Report (EIR) for a solar project encompassing ±477-acres in the northern portion of the City. The solar project includes the following two GPAs and two REZs:

- General Plan Amendment GPA23-000001/ Rezone REZ23-000001: A General Plan Amendment (text and map) to create a new Renewable Energy (E) land use district, and to modify the land use designation on the northern 241-acres of the subject site from Rural Living (RL-5) to E. This would result in a loss of 49 potential residential units.
- General Plan Amendment GPA24-000001/ Rezone REZ24-000001: A General Plan Amendment (map) to redesignate the southern 236-acres from Rural Living (RL-5) and Single-Family Residential (RS-E) to Single-Family Residential, 1 unit per acre (RS-1). This increases the density of the southerly 236 from the currently allowable 71 units to a maximum of 236 units.

The GPAs and REZs described above are necessary to assure that the city experiences no net loss in potential residential units, as prescribed by SB 330. Because the solar project will eliminate the potential for 48 residential units (the maximum density allowed in the RL-5 designation), the GPA and REZ proposed under the solar project increases the density of the southerly 236 acres from the currently allowable 71 units to a maximum of 236 units. This change will therefore accommodate the 48 units lost by the solar project and the 61 units lost by the proposed Project and leave a surplus of 56 units. As such, the City is not expected to limit or reduce residential development from occurring as a result of the proposed GPA and REZ, and complies with SB 330.

Environmental Setting and Surrounding Land Uses

The site is bound by Twentynine Palms Highway to the north, Sullivan Road to the south, Shoshone Valley Road to the east, and an extension of Lear Avenue to the west (see Exhibit 3). The surrounding environment consists of low-density residential homes to the west, vacant land and a single family home to the east, and undeveloped vacant lots, similar to the Project site, to the north, and south. The parcel is undeveloped and vacant with desert vegetation and a dry drainage running from northeast to southeast in the eastern half of the property, outside the development area.

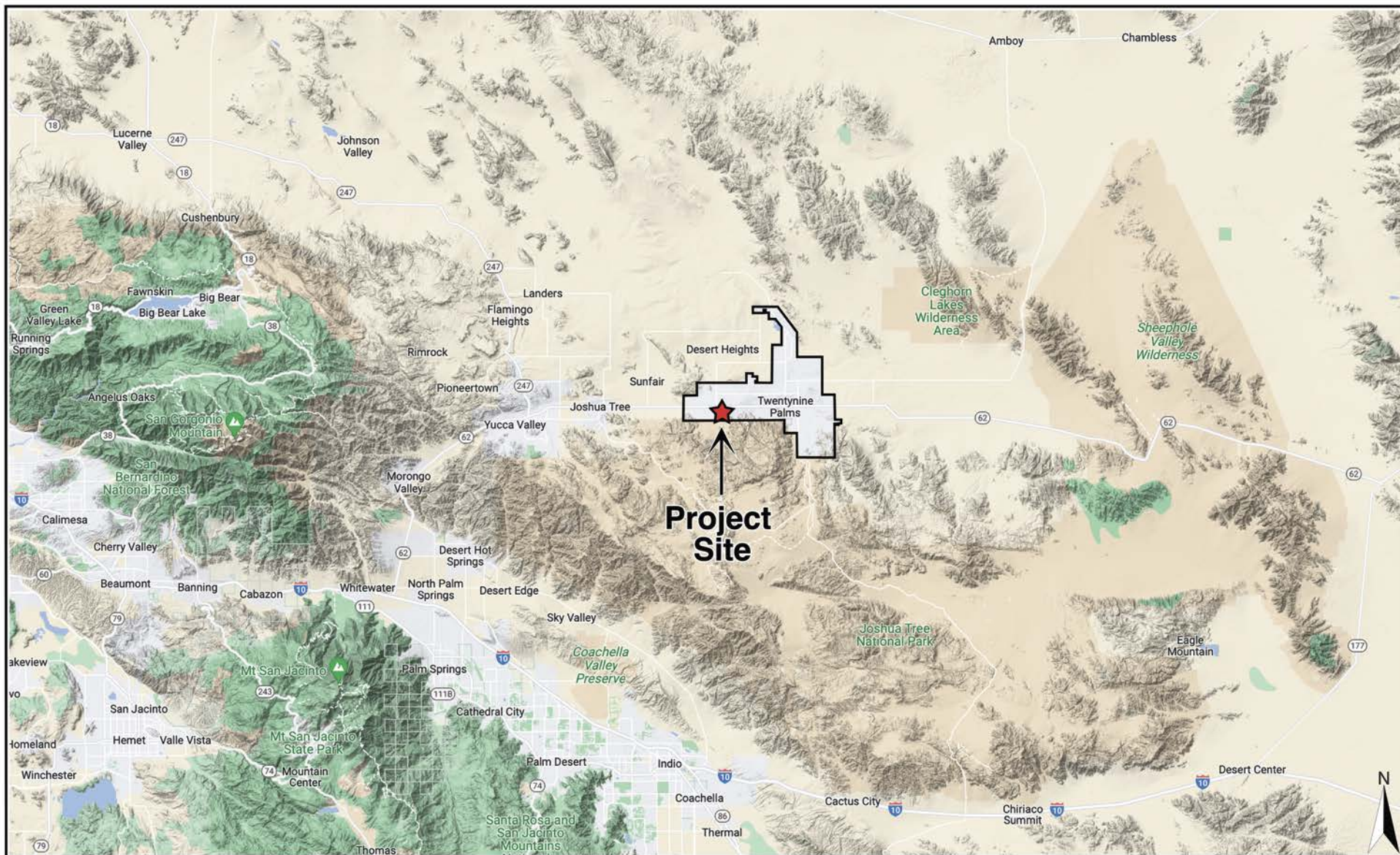
Utilities and Service Providers

The following agencies and companies will provide service to the Project site:

1. Sanitary Sewer: Private Septic
2. Water: Twentynine Palms Water District
3. Electricity: Southern California Edison
4. Gas: Southern California Gas Company
5. Telephone: Frontier Communications
6. Cable: Spectrum
7. Trash disposal: Burrtec Waste Industries, Inc.

Other public agencies whose approval is required.

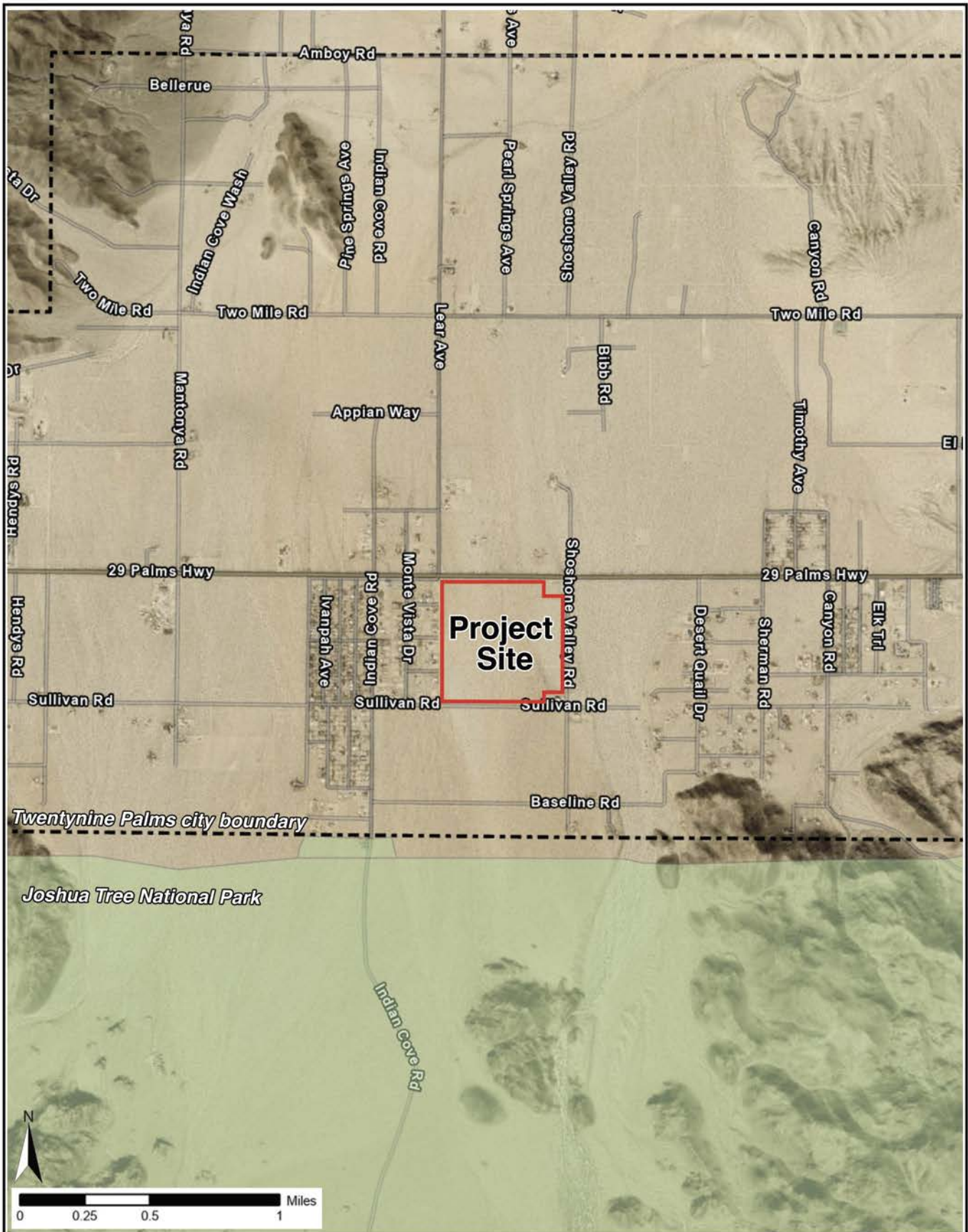
Regional Water Quality Control Board



Source: Google Maps, 2024

12.05.24

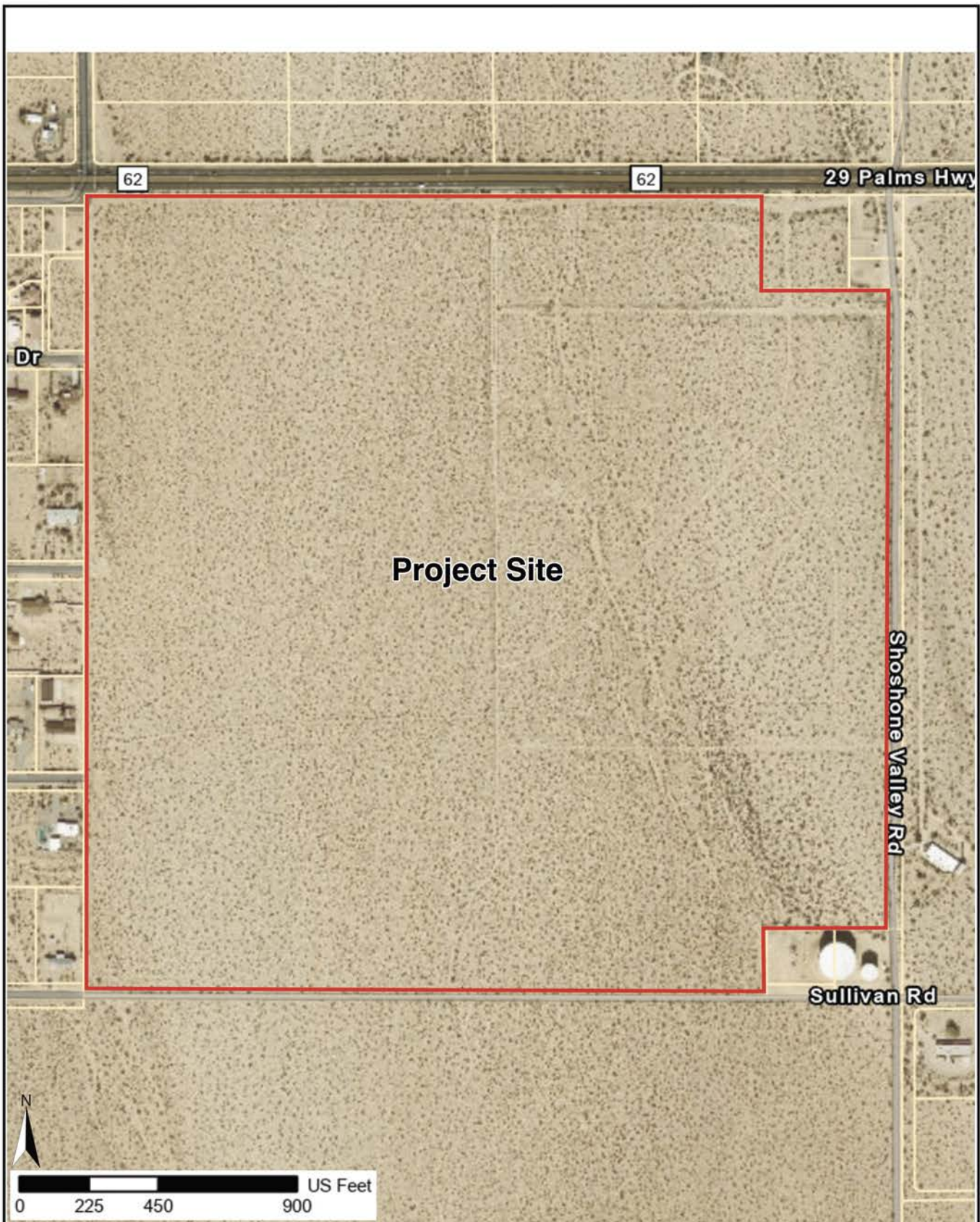
Regional Location Map Ofland Hotel Twentynine Palms, California



Source: ESRI, 02.16.2024

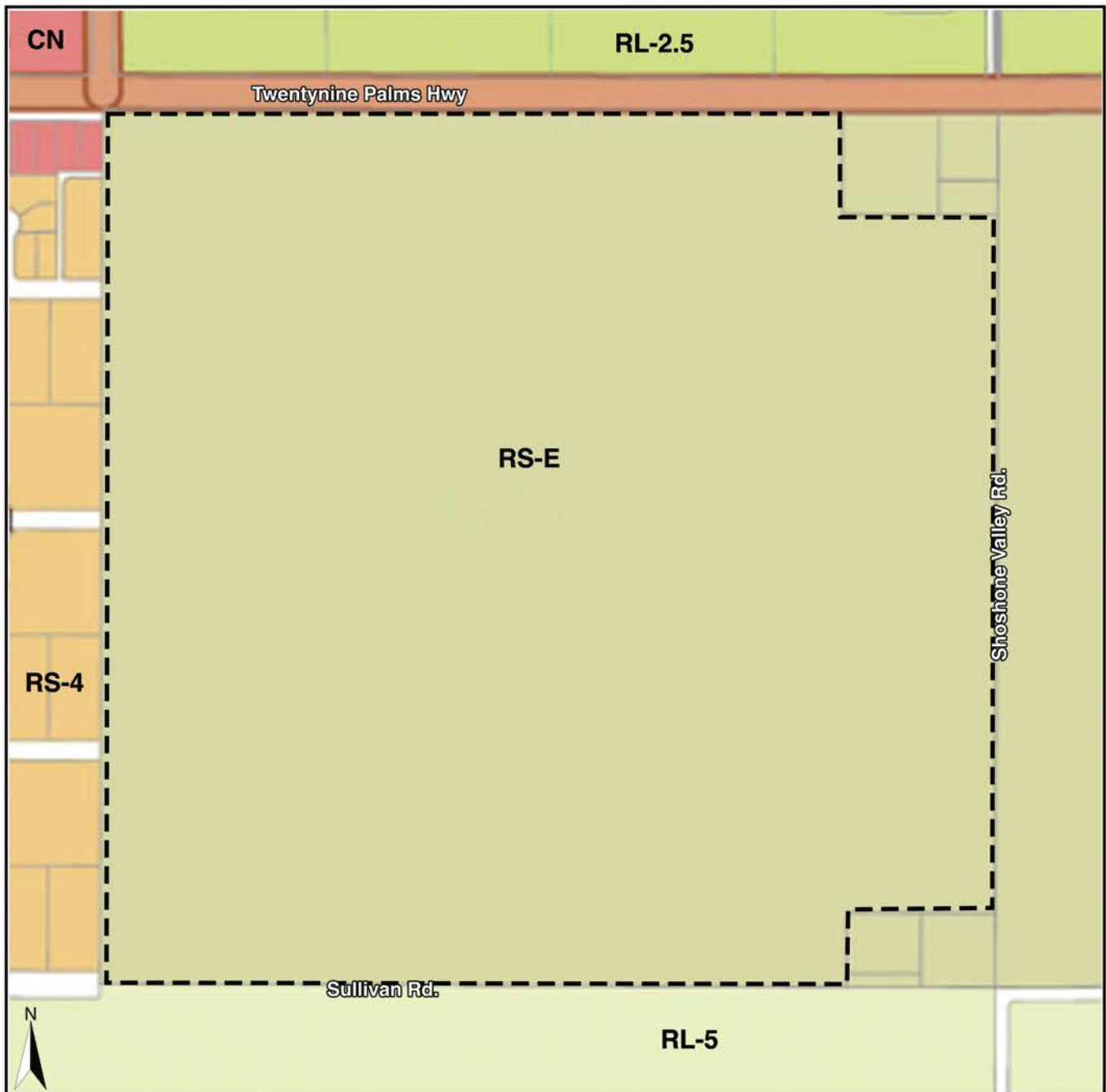
12.05.24

Exhibit



Source: ESRI, 02.16.2024

12.05.24

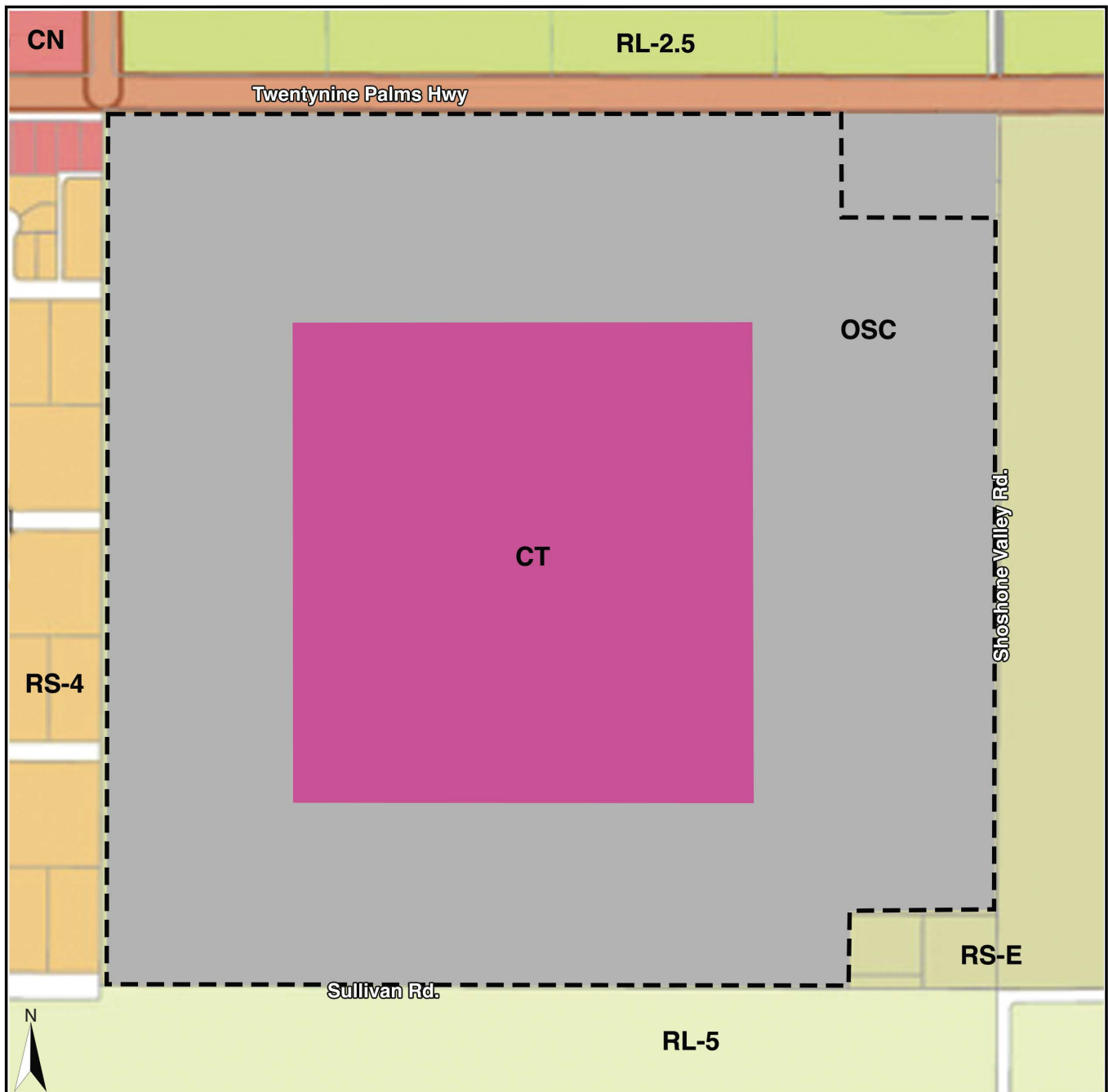


- Single-Family Residential (RS-4)
- Single-Family Residential (RS-E)
- Rural Living (RL-2.5)
- Rural Living (RL-5)
- Neighborhood Commercial (CN)

Project Site

Source: City of Twentynine Palms Land Use Map, revised December 12, 2022

12.05.24

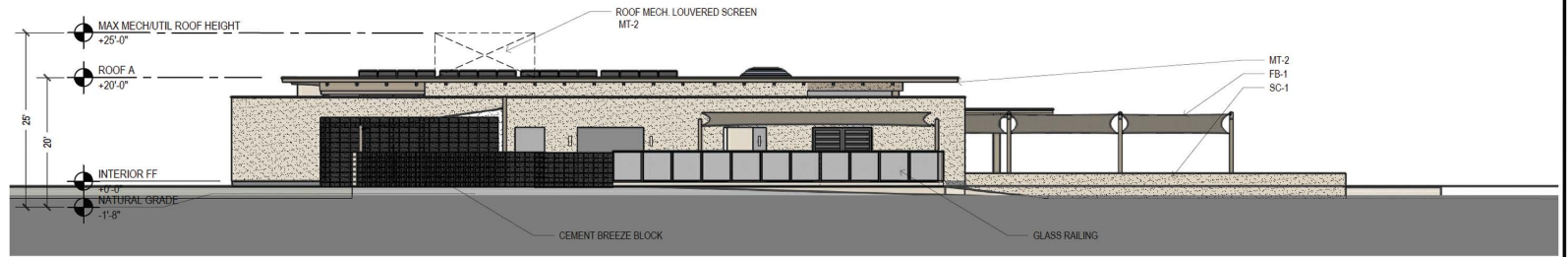


- Single-Family Residential (RS-4)
- Single-Family Residential (RS-E)
- Rural Living (RL-2.5)
- Rural Living (RL-5)
- Neighborhood Commercial (CN)
- Tourist Commercial (CT)
- Open Space Conservation (OSC)

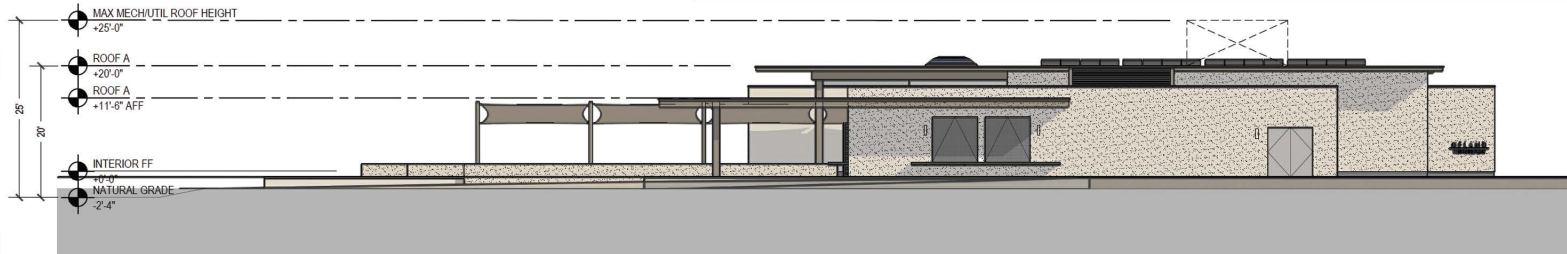
 Conservation Area

Source: City of Twentynine Palms General Plan Amendment, NV5, 03.2025

03.31.25



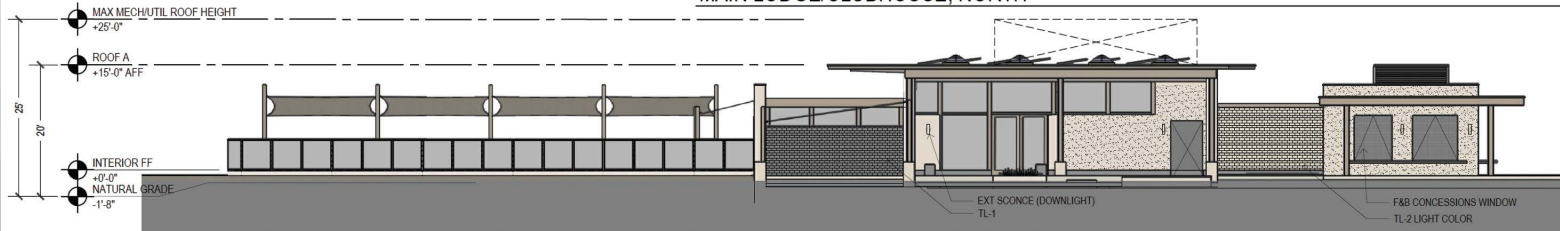
MAIN LODGE/CLUBHOUSE, WEST



MAIN LODGE/CLUBHOUSE, EAST



MAIN LODGE/CLUBHOUSE, NORTH



MAIN LODGE/CLUBHOUSE, SOUTH

LEGEND

| | |
|------|----------------------------|
| MT-1 | METAL ROOF |
| MT-2 | METAL FLASHING / DETAILING |
| MT-3 | METAL CORRUGATED SIDING |
| CB-1 | FIBER CEMENT EXT. SIDING |
| WD-1 | WOOD EXT. SIDING |
| WD-2 | WOOD EXT. SIDING ACCENT |
| FB-1 | FABRIC SHADE |
| TL-1 | TILE EXT. SIDING |
| SC-1 | STUCCO SIDING |
| CC-1 | CONCRETE 1 |

NOTE: ALL MATERIALS DESIGNED TO BLEND WITH ADJACENT STRUCTURES AND DESERT TONES. (CREAM/SAND/TAN/ DARK BROWNS/ CHARCOAL WITH SOME ACCENT COLORS LIMITED TO SIGNAGE, FABRICS, ETC)

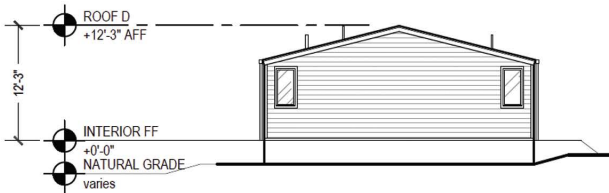
Source: Boundary Works, 11.2024

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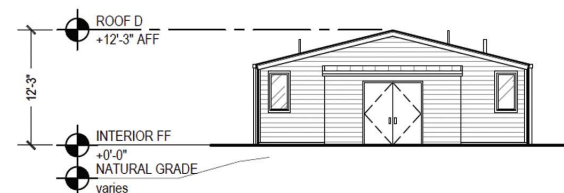
Elevations: Main Lodge
Ofland Hotel
Twentynine Palms, California



EMPLOYEE HOUSING - EAST



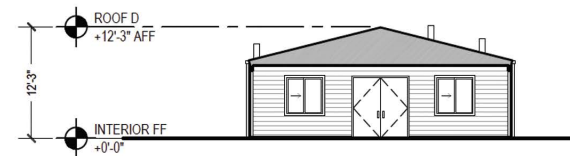
EMPLOYEE HOUSING - NORTH



EMPLOYEE HOUSING - SOUTH



PH2 EMP HOUSING - WEST



EMP HOUSING - BREEZEWAY NORTH

| LEGEND | |
|--------|----------------------------|
| MT-1 | METAL ROOF |
| MT-2 | METAL FLASHING / DETAILING |
| MT-3 | METAL CORRUGATED SIDING |
| CB-1 | FIBER CEMENT EXT. SIDING |
| WD-1 | WOOD EXT. SIDING |
| WD-2 | WOOD EXT. SIDING ACCENT |
| FB-1 | FABRIC SHADE |
| TL-1 | TILE EXT. SIDING |
| SC-1 | STUCCO SIDING |
| CC-1 | CONCRETE 1 |

NOTE: ALL MATERIALS DESIGNED TO BLEND WITH ADJACENT STRUCTURES AND DESERT TONES. (CREAM/SAND/TAN/ DARK BROWNS/ CHARCOAL WITH SOME ACCENT COLORS LIMITED TO SIGNAGE, FABRICS, ETC)

Source: Boundary Works, 11.2024

12.05.24

**Elevations: Employee Housing
Ofland Hotel
Twentynine Palms, California**

Exhibit

8


ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)
 On the basis of this initial evaluation:

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


 Signature

5/12/25
 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063I(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

Sources: City of Twentynine Palms General Plan (2012); Google Earth Pro.

Environmental Setting

Twentynine Palms (City) is located in the southwestern corner of the Mojave Desert. The City is geographically defined by the Bullion Mountains to the north, the Queen Mountains to the south, the Valley Mountains to the northeast, and the Twentynine Palms Mountains to the southeast. The City is characterized by its rich desert landscape, small town living, and its proximity to the Joshua Tree National Park and the Marine Corps Ground Air Combat Center.

The City encompasses approximately 37,600 acres of land occupied by residential, commercial, industrial, and public facilities. Residential land-use dominates the urban landscape, accounting for approximately 97% of total development.¹ The proposed site is located to the southwest portion of the City and is bound by undeveloped vacant lands to the north and south, single-family residential development to the west, and vacant land and a single family home to the east.

The site is an undeveloped vacant parcel situated at an elevation ranging from ±2,600 to 2,500 feet above mean sea level. Current conditions include sandy soil, scattered native vegetation, and a dry drainage running north-south on the eastern portion of the site, outside the development area. The Project's development would result in the construction of 100 single-story units, 25 employee housing units, two lodges, recreational amenity spaces, onsite parking, back of house facilities, and an on-site wastewater treatment

¹ Twentynine Palms General Plan "Land Use", Table LU-4, (2012).

plant. The site has unobstructed views of the Copper Mountains to the northwest, the Bullion Mountains beyond to the northeast, Rattlesnake Canyon to the south, and the Joshua Mountains the southeast.

Discussion of Impacts

a-b) No Impact. Scenic resources in Twentynine Palms include the desert landscape adjacent to the Joshua Tree National Park, Mesquite Dunes and Bosque (MDB) including the Mesquite Lake Playa and the Mesquite Springs, as well as the hillsides to the north and south. In an effort to conserve and protect these scenic resources and vistas, the City prohibits and/or limits development that interferes with the Joshua Tree National Park Buffer Overlay, Mesquite Dunes Overlay, and the Hillsides Overlay.

The Project's site is an undeveloped vacant parcel approximately 152-acres in size, located on the southeast corner of Lear Avenue and Twentynine Palms Highway (SR-62). The Project proposes a luxury outdoor resort comprised of 100 units, 25 employee housing units, and amenities including, but not limited to, two lodges, recreational spaces including swimming pool and spa, stargazing and movie screening area.

All development and activities related to the Project's operation will be located within the central ± 42 acres of the large parcel. The maximum permitted building height is 25 feet. All structures are proposed to be single-story with a maximum height of 25 feet (see Exhibits 7 and 8). Given the scattered layout of the site plan and low building profiles, on-site structures are not expected to reduce or limit the visibility of the mountain range for onsite occupants or development within the Project area.

The Project's setbacks on the north, south, west, and east, function as buffer zones which minimize the impacts to scenic vistas associated with the Project's development by providing preserved natural areas and distance to the developed portion of the site. Public views of the mountains from Lear Avenue or Shoshone Valley Road to the north and south will not be impacted by Project structures due to distance, limited mass and the single story nature of the buildings, and will remain unobstructed. Views to the mountains south, east and west from Sullivan Road will not be impacted by the Project, because the project occurs north of Sullivan Road. From SR-62, views to the south, southeast and southwest to the mountains will remain unobstructed, due to the distance to the closest structure (over 600 feet), the small mass and scale of the hotel units, and the topography of the site. Views to the north from SR-62 will be unimpeded because the Project occurs on the south side of the highway.

The Twentynine Palms 2012 General Plan classifies the local mountain range as a scenic resource and SR-62 as a scenic highway. In relation to the Project, the Joshua Tree National Park Mountains foothills are approximately 3 miles to the south and southeast, the MDB is approximately 6.5 miles to the northeast, and the hill adjacent to Copper Mountain is located approximately 2 miles to the northwest.

The Project does not interfere with a buffer overlay or adversely affect a designated scenic resource. No scenic resources such as Joshua Trees were detected on-site during the biological field assessment.² Therefore, no scenic resources or vistas are anticipated to be adversely affected by the Project.

No scenic vistas or resources are located within proximity to the Project. Any impacts related to the Project's development are reduced by the Project's design and compliance with the City's development standards. For these reasons, no impacts will occur.

- c) **Less Than Significant Impact.** The Project is located in a sparsely developed area of Twentynine Palms. Single family residential properties are west of the site, beyond the proposed extension of Lear Avenue, and one single family home occurs at the southeast at Shoshone Valley Road and Sullivan Road. Large undeveloped parcels are located across Twentynine Palms Highway to the north, to the east beyond Shoshone Valley Road and beyond Sullivan Road to the south.

According to the City's General Plan and Zoning Map, the site is designated Single-Family Residential-Estate (RS-E). However, a GPA, DCA and REZ are proposed to redesignate the Project's central ± 42 acres to Tourist Commercial (CT) and the remaining ± 110 acres to Open Space Conservation (OSC). The CT designation allows the development of the proposed hotel, employee housing units, on-site recreation and similar supporting facilities within the central Tourist Commercial core. Lands to be designated under the Open Space designation would remain in their current natural condition, and would be preserved in this condition for the life of the Project with the exception of access roadways and the wastewater treatment plant. As described in response I.a-b) above, the development of the Project will not impact scenic resources or block scenic vistas. The low density of hotel units, located at least 500 feet from any abutting property or public roadway, will not impact the visual character of the area, as the units will not dominate the landscape. Rather, some unit rooftops may be seen from public vantage points, at a significantly lesser density than the single family homes located immediately west of the Project site. The conservation area buffer, and the low intensity of the single story units proposed, will assure that there will be no impact to the visual character of the area as a result of the development of the proposed Project. As it relates to the GPA, and the change from single family residential units to hotel units, no increase in impacts is expected, because the current designation would allow 61 single family homes across the entire 152 acres. These homes would be expected to range in size from 1,000 to 2,500 square feet, and would also generate driveways, ancillary buildings and accessory dwelling units. The proposed Project would result in 100 384 square foot hotel cabins distributed across the center of the site, while the single family homes would be distributed across the entire parcel, including the frontage along SR-62, a scenic roadway. No conservation land would be expected to result from a single

² WSP USA, Ofland Glamping Resort Project Biological Resources Assessment Report, Accessed 2024.

family development. Therefore, the impact to the visual character of the site would be greater under the current General Plan designation than the proposed Open Space and Tourist Commercial designation.

The Project will be required to adhere to the City's development standards for CT land use and zoning as outlined in the Section 19.70.070 of the City's Municipal Code. By law, the Project will comply with any applicable development standard and ordinance. The Project will not conflict with any land use/zoning designation or governing regulation. Less than significant impacts would result to the visual character of the area.

- d) **Less Than Significant Impact.** The city mandates all outdoor light fixtures have a shield to focus light downwards and reduce the amount of light pollution emitted onsite (Code Section 19.78.050). In accordance with the City Municipal Code, the Project will be required to reduce light pollution by operating low and downward focused light fixtures. The standardized practice will reduce the Project's light pollution and thus, the Project is not expected to adversely affect day and nighttime views. Impacts related to light and glare are expected to be less than significant.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|------------------------------------|--------------|
| II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project: | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | | | | X |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | X |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | | | | X |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | | | | X |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | | X |

Sources: Twentynine Palms General Plan "Land Use" (2012); USGS Map of Croplands in the United States, <https://www.usgs.gov/apps/croplands>; California Department of Conservation Farmland Mapping and Monitoring Program, <https://www.arcgis.com/apps/mapviewer>, California Department of Conservation, Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/app/>; California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/>, Accessed December 2024.

Environmental Setting

There is no prime farmland or farmland of statewide importance designated in Twentynine Palms. Agricultural production is generally not active in the Morongo Basin, nor in the City of Twentynine Palms. Commercial farming has not occurred in the City for decades, likely due to its arid environment. Neither the General Plan nor the Development Code contain agricultural or forestry designations or districts, but in certain districts agricultural and related uses are allowed with a Conditional/Administrative Use Permit or other restrictions.

Discussion of Impacts

a-e) No Impact.

Prime Farmland: The site is currently undeveloped and vacant. No prime or unique farmland or farmland of statewide importance is found within the Project's vicinity. The development of the Project will not result in the diversion of farmland to nonagricultural use. No impacts will occur.

Williamson Act: The Project proposes a GPA, DCA and REZ to change the designation of the Project site from Single-Family Estate Residential to Tourist Commercial and Open Space Conservation. None of these land uses/zoning designations are intended for agricultural production. There are no agricultural land uses in the vicinity of the Project. Additionally, there are no Williamson Act contracted lands in the area. No impacts will occur.

Forest/Timber Land: The site is located on the desert floor part of the southern region of the Mojave Desert. There are no forest or timber lands or timberland resources found within proximity to the site. The Project's development will not result in the loss of forest land for non-forest use. No impacts will occur.

Overall, the Project would not reduce or impact agricultural resources in Twentynine Palms. Nor will it conflict with General Plan Land Use designations for agriculture or forest lands. For these reasons, the Project is anticipated to have no impact regarding agricultural and forest resources.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | | | X | |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | | | X | |
| c) Expose sensitive receptors to substantial pollutant concentrations? | | | X | |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | X | |

Sources: City of Twentynine Palms General Plan; MDAQMD 2020 CEQA and Federal Conformity Guidelines; CalEEMod Version 2022.1; project materials.

Environmental Setting

The City of Twentynine Palms, including the Project site, lies within the Mojave Desert Air Basin (MDAB), and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). MDAQMD is geographically the second largest of the 35 air districts in the State of California. All development within the city is subject to MDAQMD's 2020 "California Environmental Quality Act (CEQA) and Federal Conformity Guidelines." MDAQMD obtains air quality data from air quality monitoring stations in cities throughout its jurisdiction.

Criteria air pollutants are contaminants for which state and federal air quality standards (California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS)) have been established. The MDAQMD is in nonattainment for ozone (O₃) (severe-18 classification) and inhalable particulate matter less than 10 microns in size (PM₁₀) (moderate classification) under the California and National Ambient Air Quality Standards (CAAQS and NAAQS, respectively). As a result, MDAQMD has adopted federal attainment plans for ozone and PM₁₀ under the Federal Clean Air Act. Ambient air quality in the MDAQMD, including the Project area, does not exceed state and federal standards for carbon monoxide, nitrogen dioxides, particulate matter less than 2.5 microns in size, sulfur dioxide, lead, sulfates, hydrogen sulfide, or visibility reducing particles.

The Project will contribute to an incremental increase in regional ozone and PM₁₀ emissions primarily during construction.

The California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to project air quality emissions that will be generated by the proposed Project (Appendix A) and are discussed below.

Discussion of Impacts

- a) **Less Than Significant Impact.** According to MDAQMD's 2020 CEQA and Federal Conformity Guidelines, a project is considered non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. An example of a non-conforming project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area relative to the applicable land use plan.

The 152-acre Project site is designated Single Family Residential Estate (RS-E) which allows 0.0 to 0.4 dwelling units per acre, or 1 dwelling unit per 2.5 acres, which would allow a maximum of 61 residential units. The Project includes a GPA, DCA and REZ that would designate 42-acres to Tourist Commercial (CT) and 110 acres Open Space Conservation (OSC). The Project proposes a hotel, whose emissions, as shown in Table 2 below, will not exceed MDAQMD thresholds of significance.

The Project will be required to comply with all District rules, as described below, and does not substantially increase the population of the City or affect its growth forecasts (see Population below), since employees would be expected to be existing City residents or future residents anticipated in the City's future growth. Therefore, the proposed Project will not induce unplanned population growth over what was previously allowed and assumed on-site, and the Project does not conflict with or obstruct implementation of the AQMP.

As demonstrated below, the Project will not generate emissions that exceed thresholds for criteria pollutants including pollutants for which the District is in nonattainment. The proposed Project will also be subject to rules and guidelines set forth by MDAQMD including best management practices and preparation of a dust control plan during construction. There will be less than significant impacts regarding conformity with applicable air quality plans and guidelines.

- b) **Less Than Significant Impact.** A significant impact could occur if the Project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Mojave Desert portion of the MDAB is classified as a “non-attainment” area for ozone and PM₁₀. Cumulative air quality impacts are evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM₁₀, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM₁₀.

Currently MDAQMD’s approach to assessing cumulative impacts is based on the MDAQMD Attainment Plan forecasts for attainment of ambient air quality standards in accordance with the requirements of the California Clean Air Act (CCAA), which consider the forecasted future regional growth. Therefore, if all projects are individually consistent with the growth assumptions within MDAQMD’s Attainment Plan, and criteria pollutant emissions do not exceed MDAQMD’s recommended regional thresholds of significance, future development would not impede the attainment of ambient air quality standards. As indicated under response III.a), above, the proposed Project is not directly growth-inducing. Therefore, the Project is expected to be consistent with the growth assumptions within the MDAQMD’s Attainment Plan.

CalEEMod Version 2022.1 was used to project criteria pollutant emissions that will be generated by the proposed Project (Appendix A). The model applies default values for various land uses, including trip generation rates based on the Institute of Transportation Engineers (ITE) Manual, vehicle mix, trip length, average speed, etc. However, where project-specific data is available, such data was input into the model. Project-specific information input into the model was derived from the project description at the beginning of this document and from supplemental information provided by the Project traffic report and engineering materials.

Criteria air pollutants will be released during both the construction and operation phases of the proposed Project, as shown in Tables 1 and 2. Table 1 summarizes short-term construction-related emissions, and Table 2 summarizes ongoing emissions generated during operation.

Construction Emissions

Short-term emissions of air quality pollutants will occur during site preparation, grading, building construction, and paving. Sources of construction-related emissions include the operation of construction equipment, material imports and exports, as well as vehicles transporting workers to and from the Project site. For purposes of analysis, it is assumed that construction will occur over a 1-year period starting June 2025 and ending June 2026.

As shown in Table 1, emissions generated by construction activities will not exceed MDAQMD thresholds for any criteria pollutant during construction. The data reflect average daily unmitigated emissions over the 1-year construction period, including summer and winter weather conditions. The analysis assumes soils will balance on-site. Applicable standard requirements and best management practices include, but are not limited to, the implementation of a dust control and management plan in conformance with MDAQMD Rule 403. Given that criteria pollutant thresholds will not be exceeded, and standard best management practices will be applied during construction, impacts will be less than significant.

| Table 1 | | | | | | |
|--|------------|-----------------------|------------|-----------------------|------------------------|-------------------------|
| Maximum Daily Construction-Related Emissions Summary (pounds per day) | | | | | | |
| Construction Emissions¹ | CO | NO_x | ROG | SO₂ | PM₁₀ | PM_{2.5} |
| Daily Maximum | 31.6 | 31.7 | 7.35 | 0.06 | 9.26 | 5.25 |
| MDAQMD Thresholds | 548 | 137 | 137 | 137 | 82 | 65 |
| Exceeds? | No | No | No | No | No | No |
| Emission Source: CalEEMod model, version 2022.1 | | | | | | |

Operational Emissions

Operational emissions are ongoing emissions that will occur over the life of the project. They include area source emissions, emissions from energy demand (electricity), and mobile source (vehicle) emissions. Table 2 provides a summary of projected emissions during operation of the proposed project at build out. According to the traffic report, the Project is estimated to generate 894 daily trips, with 54 trips during the AM peak hour and 62 trips during the PM peak hour (see Section XVIII Transportation and Traffic). As shown below, operational emissions will not exceed MDAQMD thresholds of significance for any criteria pollutants for operations. Impacts related to operational emissions will be less than significant.

| Table 2 | | | | | | |
|---|------------|-----------------------|------------|-----------------------|------------------------|-------------------------|
| Maximum Daily Operational-Related Emissions Summary (pounds per day) | | | | | | |
| Operational Emissions¹ | CO | NO_x | ROG | SO₂ | PM₁₀ | PM_{2.5} |
| Daily Maximum | 57.5 | 6.63 | 6.61 | 0.13 | 11.3 | 2.96 |
| MDAQMD Thresholds | 548 | 137 | 137 | 137 | 82 | 65 |
| Exceeds? | No | No | No | No | No | No |
| Emission Source: CalEEMod model, version 2022.1 | | | | | | |

Conclusion

As shown above, both construction and operation of the proposed Project will result in criteria emissions below the MDAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation. As indicated under response III.a), above, the proposed Project is not directly growth-inducing. Therefore, the Project is expected to be consistent with the growth assumptions within the MDAQMD's Attainment Plan. Overall, impacts related to construction and operation will be less than significant and are not cumulatively considerable from a non-attainment standpoint.

c) Less Than Significant Impact. A project would have a significant impact if the proposed project would expose sensitive receptors to substantial concentrations of criteria air pollutants or toxic air contaminants (TACs) including asbestos, diesel particulate matter (diesel PM) from construction equipment and vehicle traffic, and fugitive dust from construction activity. According to the MDAQMD CEQA and Federal Conformity Guidelines, residences, schools, daycare centers, playgrounds and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (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 closest sensitive receptors to the site are single family residences located immediately west of Lear Avenue (30-40 feet), and over 500 feet from the development area. However, the Project does not propose a use listed above, and therefore is not considered a potentially hazardous site that could potentially impact neighboring sensitive receptors.

Construction activities associated with the proposed Project would take place over a period of 1-year, although the level of activity would vary both temporally and spatially. The construction emissions were found to be less than significant, as indicated above in Response III.b), above. Therefore, construction of the Project will not expose sensitive receptors to substantial pollutant concentrations and impacts are considered less than significant.

After construction is completed, there would be operational traffic associated with worker commute, food/merchandise deliveries, and guests. According to the traffic report, the Project is estimated to generate 894 daily trips. Emissions from this small number of vehicle trips were found to be less than significant, as indicated above in Table 2, above.

The Project also proposes an on-site wastewater treatment plant (WWTP), which will be enclosed in a 100 SF structure located approximately 300 feet north of the nearest unit. Applicable WWTP equipment such as emergency generators would be subject to permit requirements of MDAQMD and/or CARB, which require new or modified emission units be equipped with the current BACT for all subject air contaminants. Therefore, diesel particulate emissions from project operational emissions are not expected to increase health risk at the nearest receptors; and, therefore, would be less than significant.

As demonstrated above, the proposed Project would not generate construction or operational emissions that exceed the MDAQMD's recommended regional thresholds of significance. Therefore, impacts to sensitive receptors will be less than significant.

- d) **Less Than Significant Impact.** In general, typical land uses development that pose potential odor problems include wastewater treatment plants, refineries, landfills, composting facilities and transfer stations. The occurrence and severity of odor impacts depend on such factors as the nature, frequency, and intensity of the source, wind speed and direction, and the sensitivity of the receptors. While offensive odors rarely cause physical harm, they can be unpleasant and raise public concern.

The Project proposes a hotel and is not expected to generate objectionable odors during any phase of construction or at Project buildout. Short term odors associated with paving and construction activities could be generated; however, any such odors would be quickly dispersed below detectable levels as distance from the construction site increases and would occur for short time periods during construction only.

The Project proposes a food and beverage space near the main lodge, and a communal kitchen space in the employee housing units, which would involve food preparation and could result in cooking exhaust, smoke, and related food waste. The on-site food and beverage space would be required by law to provide a hood system, if required for operation, that consists of particulate filtration for smoke, gas filtration for gases/odors, and a blower to move the air into the hood, through the air cleaning equipment, and then outdoors.

The proposed Project includes a wastewater collection system and treatment plant and has the potential to generate objectionable odors. The Project would not result in uncontrolled sources of odor during operations. The proposed WWTP is required to include odor control technology to capture and treat foul air produced by raw wastewater before it is exhausted from channels and tanks, which will be fully enclosed. In addition, much of the WWTP operation will be housed in an enclosed structure, which will further minimize the release of odors and limit the impacts to surrounding sensitive receptors. Application of standard odor control technology will ensure potential impacts associated with odor would remain less than significant.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|------------------------------|-----------|
| IV. BIOLOGICAL RESOURCES -- Would the project: | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | X | | |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | | X | | |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | | | X |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (General Plan) | | | X | |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | X | |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | | | X | |

Sources: Twentynine Palms General Plan "Conservation and Open Space Element" (2012); California State Water Boards, https://www.waterboards.ca.gov/board_reference/majorfunctions/dredge_fill.pdf, Accessed February 2024; Yonder Glamping Resort Project Biological Resources Assessment Report, prepared by WSP, March 18, 2024; Yonder Glamping Resort Project Delineation of Jurisdictional Waters, prepared by WSP, February 8, 2024

Environmental Setting

Twentynine Palms is located in the southwest corner of the Mojave Desert Province, within the Morongo Basin. The City's desert landscape, dry lake beds, and ecological habitats support a diverse set of wildlife and plant species. 36 wildlife and 16 plant species are listed as species of concern and are known to or may potentially exist within the City. The City's General Plan Conservation and Open Space Element, Table OS-3 in the Technical Appendix lists all the species of concern and the agency responsible for their protection.

Twentynine Palms is known to harbor the desert tortoise, the most recognized high desert species in the region. The desert tortoise occurs in the Mojave Desert Province, within alluvial fan, desert wash, and scrub habitats. Ongoing threats, including population loss, habitat degradation and fragmentation due to development have resulted in the desert tortoise being listed as a federal and state threatened species. As such, the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) have established regulations to allow development to occur within a strict framework that ensures potential impacts to the desert tortoise population and sensitive habitat are reduced to the greatest extent. CEQA further requires all new developments avoid potential impacts to the desert tortoise and any other federal, state, and/or local listed species.

The West Mojave Plan, which is a regional conservation plan, listing local special species of concern that were not listed as threatened or endangered but may be candidates in the future. The Plan aims to protect federally and state listed species, as well as 100 other special status wildlife and plant species from impacts related to city buildout.

According to the City's 2012 General Plan Exhibit CO-3, the Project site is located within a linkage area. Additionally, the Joshua Tree National Park, located approximately 3 miles south of the Project, is a federal reserve, focuses on the conservation of wildlife and plants species part of the Mojave and Colorado Desert biome.

A site-specific biological resource assessment report was prepared on March 18, 2024, by WSP USA (WSP) (Appendix B). The report consists of a literature review, record search, and biological field survey to determine the Project's biological impact onto the native habitat. WSP also prepared a Delineation of Jurisdictional Waters report (Appendix C) on February 8, 2024. The following analysis is based on the findings of these report.

Discussion of Impacts

a-b) Less Than Significant Impact with Mitigation. The site is an undeveloped vacant parcel ±152 acres in size consisting of desert terrain. Surrounding the site are single-family residential properties to the west, vacant lands and a single family home to the east, and desert lands to the north (beyond SR-62) and south.

A biological field survey was conducted at the Project site on October 26, 2023. The biologist evaluated the site to assess the habitat onsite and the site's probability to support species of concern. The results indicate that the Project site is disturbed in the form of unpaved roadways located along the Project's perimeter. Nonetheless, the site is identified as a suitable habitat for dominant plant species, wildlife, and species of concern.

No special status species were detected during the field survey; however, there is the potential for five plant and six wildlife special status species including invertebrates, reptiles, mammals, and birds to occur within the Project area. Each of the potential species is addressed below. In addition, in order to assure that impacts to species during the construction process remain less than significant

overall, Mitigation Measure BIO-5, below, requires that construction personnel be educated on special status species prior to the initiation of construction, so that they can prevent impacts to sensitive species.

Special Status Plant Species: A total of ten special status plant species have a probability of occurring, of which only five have a moderate likelihood given the presence of suitable habitat. These species include (1) Joshua tree poppy, (2) Utah cine milkweed, (3) Parish's club-cholla, (4) Little San Bernardino Mountains linanthus, and (5) Hall's tetracoccus. None of these potentially occurring plant species are listed as threatened or endangered at the federal or state level. Given the Project's impact footprint, it is considered unlikely that the Project would cause a significant decline in the viable populations of these species. The Project will have a less than significant impact on special status plants.

Special Status Invertebrate Species: There is a very low potential for Robert's rhopalemma bee occupying the site. A single occurrence of the species was recorded 5 miles south of the site, in 1973. The species is not protected by USFWS or CDFW. No impact to the species is expected.

Special Status Reptile Species: The desert tortoise is federally and state listed as threatened. The probability of the desert tortoise to occur onsite is moderate due to the presence of suitable habitat. The site's dominant vegetation (creosote bush scrub) is a habitat typically utilized by desert tortoises. Although no desert tortoise individual or sign was identified onsite during the field survey, habitat on the site is suitable, and they could move onto the site prior to construction. Impacts to the species, should they occur would be significant if not mitigated. For this reason, Mitigation Measure BIO-1 is provided below to ensure no desert tortoise is directly or indirectly harmed during the Project's construction and operation. Impacts to the desert tortoise will be reduced to less than significant with the implementation of BIO-1.

Special Status Bat Species: Five bat species including (1) pallid bat, (2) spotted bat, (3) western mastiff bat, (4) hoary bat, and (5) western yellow bat, are classified as species of statewide concern and have a moderate chance of foraging on the site. However, there is no roosting habitat on the site, and the species occurrence is not expected. Impacts to bat species will be less than significant.

Special Status Mammal Species: Two species of burrowing mammals, classified as being of statewide concern, have a low potential of occurring onsite: the American badger and the pallid San Diego pocket mouse.

For the American badger, the likelihood of the species occurring is low, because although the site provides suitable habitat no suitable burrows were detected during the field survey. For the pallid San Diego pocket mouse, the site features vegetation associated with the species, such as creosote bush scrub, but it lacks the preferred rocky soil the species typically inhabits. Records dating to 1986 indicate the species was detected approximately 2.5 miles to the south, within the

foothills of the mountains. Although the likelihood of occurrence of either species is low, Mitigation Measure BIO-4 is provided below, in the event they are identified on site. This mitigation measure will assure that impacts to the species will be less than significant.

Special Status Bird Species: There are two special status birds: the loggerhead shrike, classified as a species of special concern by the state, and the burrowing owl, which was recently proposed for listing by CDFW. Loggerhead shrike has a high probability of occurrence because nesting and foraging habitat is present onsite. The species was not detected during the field survey, but because of its high probability of occurrence, Mitigation Measure BIO-2, which requires surveys for nesting birds if ground disturbance and vegetation removal is proposed during the nesting season for birds covered under the Migratory Bird Treaty Act (MBTA), will reduce the potential impact to the species to less than significant levels.

The burrowing owl has a moderate probability of occurring due to the presence of suitable habitat. No member of the species, and no sign of the species was identified on the Project site during the field survey. However, given CDFW's recent decision to propose the species for listing, any impact to the species would be significant. As a result, Mitigation Measure BIO-3 is provided below, which requires that pre-construction surveys be conducted no more than 14 days prior to the initiation of ground disturbance, and again 24 hours before ground disturbance, to assure that the species is not present on the site. With implementation of this mitigation measure, impacts to burrowing owl will be less than significant.

- c) **No Impact.** Section 404 of the Clean Water Act, prohibits project developers from placing excavated (dredged) or fill material into surface water, without the submission of a water quality certification to ensure the discharge is in compliance with the State's water quality standard. Jurisdictional waters or the "waters of the United States" are defined as wetlands and non-aquatic habitats, such as streams, rivers, lakes, ponds, bays, and oceans, that can otherwise be navigated water. There are no waters of the United States in the City. The CDFW has jurisdiction over "waters of the State," which include the bed and bank of streams, and in the high desert, of dry washes. The eastern portion of the Project site includes ephemeral channels which are potentially jurisdictional State waters.

There are no ponds, wetlands, riparian habitat or similar features on the site. According to the Delineation of Jurisdiction Waters report prepared by WSP (Appendix C), 1.01 acres and 6,468 linear feet of non-wetland ephemeral drainages, considered waters of the State occur on the Project site. The biologist overlaid these waters on the site plan, and found that no portion of the Project will impact these drainages, as the site has been designed to avoid them. No impact to jurisdictional waters will occur.

- d) **Less Than Significant Impact.** According to the City's 2012 General Plan, the Joshua Tree-Twentynine Palms Connection is designated within and near the City. The connection includes ±300,000 acres, of which the majority is located outside

the city limit. However, a portion of the City' western region including the Project site, is within a designated wildlife linkage area as shown in Twentynine Palms General Plan Exhibit CO-3.

Although the Project site is located within a designated wildlife corridor, the field survey concluded that the site sustains minimal biological resources and there is a moderate to low probability of special status species of occurring within the boundaries of the Project. To ensure impacts to special status species are reduced to the greatest extent, the Project will be required to implement Mitigation Measure BIO-1 through BIO-5. The Project includes 110 acres of land to be designated Open Space, and preserved for conservation. This area, and the clustered nature of the Project development area, will preserve 72% of the wildlife habitat on the property. Additionally, the Project will be required to adhere to any applicable City ordinance regarding the conservation of biological resources and species. In accordance with these standards and mitigation measures, the Project's development is not expected to pose a significant threat to the native and mitigatory species occupying the wildlife linkage. As such, less than significant impacts will occur.

- e-f) Less Than Significant Impact.** As required by law, the Project will adhere to all appropriate local policies and ordinance protecting biological resources and wildlife conservation plans. The Project will preserve 72% of the site for conservation, and concentrate development at the center of the site. There is no Habitat Conservation Plan or Native Community Conservation Plan which applies to the site. In this regard, the Project will not conflict with any standards or regulations, and impacts will be less than significant.

Mitigation Measures:

BIO-1: Desert Tortoise

Prior to the issuance of any ground disturbing permit on the Project site, pre-construction surveys consistent with the requirements of the USFWS 2019, "Preparing For Any Action That May Occur Within The Range Of The Mojave Desert Tortoise (*Gopherus Agassizii*)."

If an Agassiz's desert tortoise is found onsite during construction, all activities likely to affect that animal(s) must cease and the City, CDFW and USFWS must be contacted to determine appropriate steps. No take of the tortoise(s) may occur without prior authorization from the appropriate regulatory agencies, including CDFW and USFWS.

BIO-2: Migratory Bird Treaty Act

If possible, the removal of vegetation preparatory to construction shall occur outside the nesting season (February 1 to August 31).

If avoidance of the nesting season is not possible, a nesting bird survey shall be performed by a qualified biologist no more than three days prior to construction activities. If no nests are found, construction may proceed. If

active nests are found, a buffer zone of 500 feet for birds of prey and/or 300 feet for other unlisted birds will be put in place around the nest until the young have fledged.

BIO-3: Burrowing Owl

Two pre-construction avoidance surveys shall be performed prior to the initiation of any ground disturbing activity on the site. An initial avoidance survey no less than 14 days prior to commencing ground-disturbance activities and a final survey carried out within 24 hours prior to ground disturbance.

Should the species be identified on the site, a qualified biologist shall consult with CDFW on the development and implementation of a comprehensive burrowing owl mitigation plan.

BIO-4 American Badger and San Diego Pocket Mouse

If American badger or San Diego pocket mouse is found onsite, and if impacts to the species cannot be avoided, work in the area shall cease, and a qualified biologist shall consult with the California Department of Fish and Wildlife to develop a mitigation program.

BIO-5 Construction Worker WEAP Program

Implementation of a Worker Environmental Awareness Program (WEAP) shall be required to educate the construction crew of potential special status species present on the project site. The WEAP shall be conducted within one week of the initiation of construction, and shall be repeated as new workers/trades come onto the site. A recording of the original WEAP can be used for subsequent training.

Monitoring:

BIO-A Prior to the issuance of any permit to allow ground disturbance on the site, the City will receive and file all technical surveys and permits in the project file.

Responsible Parties: Project biologist, Planning Department, City Engineer.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| V. CULTURAL RESOURCES -- Would the project: | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5? | | | X | |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5? | | X | | |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | | | | X |

Source: Twentynine Palms General Plan (2012); Historical/Archaeological Resources Survey, Twentynine Palms Yonder Hospitality Glamping Resort Project, prepared by CRM TECH, January 24, 2024.

Environmental Setting

The City is located in the Mojave Desert. Archaeologists generally divide prehistory in the Mojave Desert region into five periods marked by changes in archaeological remains that date back to 12,000 years ago. The Lake Mojave period (ca. 8000-5500 B.C.) is associated with small mobile groups of hunters and gatherers who inhabited the Mojave Desert. These groups continued to inhabit the region during the Pinto Period (ca. 5500-2500 B.C.), and relied more on ground foods, small and large game animals, and the collection of plants. Distinct cultural changes occurred during the Newberry Period (ca. 1500 B.C.-500 A.D.), when small residential groups moved between select localities, established a geographically expansive land-use pattern and engaged in long-distance trade. The two ensuing periods, Saratoga (ca. 500-1200 A.D.) and Tecopa (ca. 1200-1770s A.D.), are characterized by seasonal group settlements near accessible food sources and the intensification of the use of plant foods, as evidenced by groundstone artifacts and the evolution of pottery.

The City is located in an area historically occupied by two Native American groups, the Serrano and the Chemehuevi. The Serrano's homeland was centered in the nearby San Bernardino Mountains, but also included lowlands along both flanks of the mountain range. The Chemehuevi, a subgroup of the Southern Paiute, traditionally occupied the Mojave Desert east to the Colorado River. The Serrano settled mostly near where flowing water emerged from the mountains. The Chemehuevi, with fewer people spread over a much wider area, cultivated, gathered, and hunted in the open deserts, but were also known for their agricultural practices. Members of each tribe gathered at important base camps or villages for annual ceremonies and tribal interaction with neighboring groups.

In the Twentynine Palms area, the Serrano and the Chemehuevi relied on the waters of a desert oasis located in the southeastern portion of the City. The Serrano first settled in the oasis and named it *Maara*, "the place of little springs and much grass". The Chemehuevi began to settle around the oasis in the mid-19th century.

While European contact may have occurred as early as 1771 or 1772, direct European influence on Serrano and Chemehuevi lifeways did not begin until the mission system expanded to the edge of Serrano territory in the 1810s. By the early 20th century, the majority of the Serrano and Chemehuevi population was incorporated into the reservation system. Today, most Serrano descendants live on the San Manuel and the Morongo Indian Reservations, while the Chemehuevi are divided among the Chemehuevi, the Colorado River, and the Morongo Reservations.

Non-Native settlement occurred in the Twentynine Palms area by the late 1800s, when prospectors sought their fortunes in nearby gold camps. The first pioneer homesteaders came in 1910, and a small community started to grow. In 1952, the U.S. Defense Department established a marine base north of the oasis for glider training, now known as the U.S. Marine Corps Air Ground Combat Center. The City of Twentynine Palms was incorporated March 23, 1987.

In January 2024, CRM TECH prepared a historical/archaeological resources assessment for the proposed Project (Appendix D). The findings of the assessment are summarized below.

Discussion of Impacts

- a) **Less than Significant Impact.** Section 15064.5 of the CEQA Guidelines defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

Section 15064.5(a)(3)(D) of the CEQA Guidelines defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The cultural resources study for the Project site included a historical/archaeological resources records search, historical research, and a field survey.

Record Search

CRM TECH conducted a records search at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) on October 23, 2023. According to the SCCIC records, no

historical/archeological resources were recorded as being within the Project site. Five historical/archeological sites were recorded as being within a one-mile radius of the site, including two linear features (State Route 62 and a trail), two surface scatters of prehistoric lithic debitage and ceramic sherds, and one residential building located north of State Route 62. Only the State Route 62 (Twentynine Palms Highway) is in the immediate vicinity of the Project site.

Historical Search

Review of historical maps and studies demonstrated that the site has a low sensitivity for cultural resources from the historic period.

Field Survey

Intensive-level field surveys were conducted on November 14 and 15 by CRM TECH staff. During the field survey, 19 previously undocumented cultural resources were recorded within the project boundaries and designated temporarily as 4064-1H through 4064-19, pending assignment of permanent identification numbers in the California Historical Resources Inventory.

The 19 newly identified cultural resources within the Project boundaries include prehistoric (i.e., Native American) milling features and lithic artifacts as well as historic-period refuse items, and they were recorded as 5 archaeological sites and 14 isolates (i.e., localities with fewer than three artifacts). Among these are 2 prehistoric sites, 3 historic-period sites, 7 prehistoric isolates, and 7 historic-period isolates. According to guidelines set forth by the California Office of Historic Preservation, isolates with fewer than three artifacts, by definition, do not qualify as archaeological sites due to the lack of contextual integrity. As such, the 14 isolates found in the project area are not considered potential “historical resources” and require no further consideration in the CEQA compliance process.

All three historic-period sites in the project area consist of mid-20th century, minor refuse scatters that do not meet the definition of “historical resources” under CEQA provisions. Less than significant impacts to historic resources will occur.

Outside but adjacent to the northern project boundary, Twentynine Palms Highway was previously recorded as a part of Site 36-010525, as noted above. CRM TECH determined the highway does not demonstrate any distinctively historical character as its current appearance reflects the results of continuous upgrading and maintenance since the historic era. Thus, it was determined that the proposed Project would have no impact on Site 36-010525 and no further consideration is required.

- b) **Less than Significant Impact with Mitigation.** Section 15064.5(a)(3)(D) of the CEQA Guidelines define archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The city has contacted Tribal representatives as part of the SB 18 and AB 52 consultation process described in Section XVIII (Tribal Cultural Resources) of this Initial Study.

The two prehistoric sites in the project area consist of milling features, one of them with an associated lithic flake, are interpreted as food-processing sites resulting from occasional use by Native people on resource-gathering excursions and do not represent the sites of long-term habitation. In addition, according to the Project site plan, each of these sites lies several hundred feet from the nearest development activities proposed on the property. To ensure the proper protection of the two prehistoric sites identified and prevent inadvertent damages, CRM TECH recommends that both sites be placed in clearly demarcated “Environmentally Sensitive Areas” during project construction (Mitigation Measure CUL-1).

Given the overall sensitivity of the Project location for buried cultural remains, CRM TECH also recommends that an archaeological monitoring program be designed and implemented during earth-moving operations associated with the project. The monitoring program should be coordinated with the Twentynine Palms Band of Mission Indians and the Morongo Band of Mission Indians, who may wish to participate (Mitigation Measure CUL-2).

Please also see Section XVIII, Tribal Cultural Resources. With implementation of mitigation measures, potential impacts to archaeological resources will be reduced to less than significant levels.

- c) **No Impact.** No cemeteries or human remains are known to occur onsite. It is unlikely that human remains will be uncovered during Project development. However, should human remains be uncovered, California law requires that all activity cease and the coroner be notified to determine the nature of the remains and whether Native American consultation is needed. This requirement of law assures that there will be no impact to cemeteries or human remains.

Mitigation Measures:

- CUL-1** The two prehistoric sites in the Project area identified as 4064-7 and 4064-18 shall be placed in clearly demarcated Environmentally Sensitive Areas during project construction. No construction activities shall be permitted in these areas.
- CUL-2** Earth-moving activities, including grading, grubbing, trenching, or excavations at the site shall be monitored by a qualified archaeologist and, if requested, a Native American monitor. The monitoring program should be coordinated with the Twentynine Palms Band of Mission Indians and the Morongo Band of Mission Indians, who may wish to participate.

If any cultural materials more than 50 years of age are discovered, they shall be recorded and evaluated in the field. The monitors shall be prepared to recover artifacts quickly to avoid construction delays but must have the power to temporarily halt or divert construction equipment to allow for controlled archaeological recovery if a substantial cultural deposit is encountered. The monitors shall determine when excavations have reached sufficient depth to preclude the occurrence of cultural resources, and when monitoring should conclude.

Monitoring:

CUL.A. Prior to the issuance of a grading permit for the site, the applicant shall provide fully executed monitoring agreement(s) to the City. Within 30 days of the completion of ground disturbing activities on the Project site, a report of findings shall be filed with the City. The report will summarize the methods and results of the monitoring program, including an itemized inventory and a detailed analysis of recovered artifacts, upon completion of the field and laboratory work. The report should include an interpretation of the cultural activities represented by the artifacts and a discussion of the significance of all archaeological finds.

Responsible parties: Project applicant, Planning Division, City Engineer.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| VI. ENERGY -- Would the project: | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | X | |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | X | |

Source: Twentynine Palms General Plan (2012).

Environmental Setting

Nuclear energy, fossil fuels (e.g. oil, coal and natural gas) and renewable sources (e.g. wind, solar, geothermal and hydropower) are various sources of energy. The electrical energy to the City is provided by Southern California Edison (SCE). Natural gas service is provided to the City by Southern California Gas Company (SoCalGas). Natural gas is mainly utilized for water heaters and heating of homes, as well as a broad range of commercial and industrial equipment. In areas where natural gas is not available, propane gas, stored in on-property tanks, is also utilized. Both SCE and SoCalGas offer various programs and incentives for all users to help reduce energy consumption.

In 2002, California established a Renewable Portfolio Standard (RPS) that requires a retail seller of electricity to include in its resource portfolio a certain amount of electricity from renewable energy sources, such as wind, geothermal, small hydro, and solar energy. Senate Bill (SB) 100 was signed into law in September 2018, which requires utilities to procure 60 percent of their electricity from renewables by 2030 and sets as a State policy that State agencies and end-use retail customers receive 100 percent of energy from renewable and zero- carbon resources by 2045. To ensure retail sellers meet their RPS requirement, the California Public Utilities Commission (CPUC) is responsible for establishing enforcement procedures and imposing penalties for non-compliance with the program (CPUC, 2018).

The California Code of Regulations Title 24, California's energy efficiency standards for residential and non-residential buildings, was established by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and took effect on January 1, 2020. Under the 2019 standards, homes will use about 53 percent less energy and nonresidential buildings will use about 30 percent less energy than buildings under the 2016 Title 24 standards.

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards

Commission and the California Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The most recent update to the CALGreen Code was adopted in 2019 and went into effect January 1, 2020.

Both SCE and SoCalGas have existing underground utilities in the Project vicinity.

Discussion of Impacts

a, b) Less than Significant Impact. The proposed Project will consume energy during both construction and long-term operation. During construction, energy demand will come from the operation of construction machinery and equipment, manufacturing of construction materials, delivery of building materials, hauling of construction debris, and commuting of workers to and from the Project site. The Project consists of typical hotel development, and has no characteristics that would result in unusually high use of energy for construction. Construction practices would be subject to current MDAQMD rules and regulations, such as source-specific standards for engines and limits on equipment idling duration. The Project would also adhere to state Low Carbon Fuel Standards for construction equipment and heavy-duty vehicle efficiency standards. These standards would reduce fuel consumption, help maximize fuel efficiency, and reduce pollutant emissions.

Long-term operational energy demand will be generated by Project lighting, heating/ventilation/air conditioning (HVAC) systems, and kitchen appliances. Energy would be consumed during the operation of community facilities, such as hotel lodges and swimming pools, as well as landscape irrigation, the transport and conveyance of water, and solid waste hauling and disposal. However, the Project will result in hotel/cabin units and employee housing typical of such construction throughout the City and region. The Project will be constructed in accordance with the state Building Code, Green Building Code, and Energy Code in effect at the time that development occurs, to ensure the most efficient building technologies are used, which will benefit overall building operations, ensure energy efficiency, and reduce wasteful and unnecessary consumption of energy resources. Current energy code requirements include the use of solar energy for non-residential projects. The Project will be required to comply with these standards.

The Project will not directly increase the population, however it will generate vehicle trips and miles traveled (VMT) and long-term fuel demand. According to the Project-specific traffic impact analysis, the Project is estimated to generate 894 vehicle trips per day (see Section XVII, Transportation). The Environmental Protection Agency (EPA) and California Air Resources Board (CARB) set forth vehicle fuel efficiency standards to reduce vehicle emissions. Although the Project will increase vehicle trips, it will not interfere with increased fuel efficiency standards or result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation.

SCE engages in renewable power generation and procurement, administers a variety of energy efficiency programs, and encourages rooftop solar energy. According to the Project-specific CalEEMod analysis (Appendix A), at buildout, the Project is projected to consume approximately 831,052 kWh of electricity and approximately 14,760 therms of natural gas per year. Actual consumption will be offset by energy-efficient appliances and future solar systems. The Project will be required to comply with solar energy requirements of the 2022 California Building Code and will not interfere with any state or local plan that promotes renewable energy or energy efficiency.

As proposed and in compliance with existing regulatory requirements, the proposed Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project operation. The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the proposed Project would result in a less than significant impact.

Mitigation Measures: None.

Monitoring: None.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| VII. GEOLOGY AND SOILS -- Would the project: | | | | |
| a) Expose people or structures to 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? | | | X | |
| ii) Strong seismic ground shaking? | | | X | |
| iii) Seismic-related ground failure, including liquefaction? | | | | X |
| iv) Landslides? | | | | X |
| b) Result in substantial soil erosion or the loss of topsoil? | | | X | |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | | | | X |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | | | | X |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | | | X | |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | | X | |

Sources: Twentynine Palms General Plan "Safety Element" (2012); Twentynine Palms General Plan "Conservation and Open Space Element" (2012); California Department of Conservation Mineral Land Classification Map, <https://maps.conservation.ca.gov/>; Geotechnical Investigation Proposed Luxury Outdoor Resort, prepared by Sladden Engineering, December 18, 2023.

Environmental Setting

Geological Setting

The City of Twentynine Palms, like most of southern California, is in a seismically active region. The Mesquite Lake fault and the Pinto Mountain fault are two major active faults within the City capable of inducing significant seismic hazards. According to the City's

2012 General Plan Safety Element, the City is vulnerable to seismic hazards including liquefaction, slope failure, settlement, soil collapse, and soil erosion.

Ground shaking: The Pinto Mountain fault crosses the City's central region, extending east to west.³ The fault is left-lateral strike slip for at least 45 miles from Twentynine Palms to the San Andres Fault.⁴ The fault can generate a maximum earthquake of 7.2 magnitude.⁵ The Mesquite Lake fault crosses the City's eastern region and extends north to south. The fault has the potential to generate an earthquake of magnitude 7.3.⁶

Twentynine Palms is vulnerable to a variety of slope failure including surficial failure, debris flow, and rockfalls. The risk of rockfalls and rockslides is located towards the mountains and adjacent areas due to moderate and steep natural slope, loose debris at the edge of slopes, and fractured bedrock. Landslides can occur at Campbell Hill, Donnell Hill and other low, unnamed hills due to poor consolidation, and the presence of silt, clay, and volcanic ash beds.⁷

Liquefaction: Seismic induced liquefaction typically occurs in areas with fine- to medium-grained sediment and shallow groundwater, less than 50 feet from ground surface. During a seismic event, these areas lose their structural integrity as they become saturated and can damage foundations and buildings by destabilizing the soil under them. Liquefaction features have been observed in Twentynine Palms across the Pinto Mountain and Mesquite Lake fault, within the City's northern and central region. The nearest liquefaction susceptible hazard zone is ±5.50 miles east of the Project site.

Slope Failure: Slope failure consists of shallow failures involving surficial soils and weathered rock in moderate to steep hillsides. Given that most of the City's developed area is relatively flat desert terrain and no mountain or hillside are in proximity, the probability of seismically induced slope failure impacting the City is low.

Settlement: During ground shaking, granular soil grains become more compact, resulting in a reduction of the soil column thickness. The difference in surface level can damage the structural foundation of buildings placed on top. Twentynine Palms is susceptible to seismically induced settlement due to the presence of alluvial sediment, aeolian (wind) sediments, and artificial fill. The Project soil type is native alluvium consisting of silty sand and sand.

Soil Collapse: Soil collapse occurs in young (Holocene age) soils including wind-deposited sand and silts, and alluvial fans or debris flow sediment deposited by flash flood. These soils may also include clay, silt, or carbonate bonds. When saturated, these collapsible soils become rearranged resulting in rapid settlement. Young alluvial fan and aeolian sediment are found throughout Twentynine Palms, thus posing a risk of soil collapse related hazards.

³ Twentynine Palms General Plan, Safety Element, Exhibit SF-1, 2012.

⁴ Southern California Earthquake Data Center, <https://scedc.caltech.edu/earthquake/pintomountain.html>

⁵ Twentynine Palms General Plan, Safety Element, Table SF-3, 2012.

⁶ Twentynine Palms General Plan, Safety Element, Table SF-3, 2012.

⁷ Twentynine Palms General Plan, Safety Element, Table SF-4, 2012.

Soil Erosion: Soil erosion occurs through the gradual decrease of landmasses through wind, water, gravity, or other geological process. Sediment forming alluvial fans in Twentynine Palms are susceptible to erosion, especially young, unconsolidated soil sediments.

Paleontological Setting

According to a paleontological report conducted for the San Bernardino County General Plan, the valley floor which encompasses Twentynine Palms, consists of younger alluvium that is too young to preserve fossil resources in the upper levels but at deeper levels, it has a higher sensitivity to paleontological resources.⁸ The City's western and southern portions, including the Project location, are mainly comprised of coarse fluvial deposits below hillsides considered to have no potential for paleontological resources.

A site-specific geotechnical report was prepared by Sladden Engineering dated December 18, 2023 (Appendix E) to assess and evaluate the Project's susceptibility to local geological hazards. The following discussion is based on the findings of the report.

Discussion of Impacts

a.i-ii) Less Than Significant Impact. The site is located in the southwest quadrant of Twentynine Palms, and consists of relatively flat, open desert terrain. The foothills of the Copper Mountains are approximately 2 miles to the northwest, and the Joshua Mountains, approximately 3 miles to the southeast.

The Project site is not located within proximity to a Alquist-Priolo Earthquake Fault Zone. Nonetheless, the Project will be subject to strong ground shaking from nearby active faults including the Pinto Mountain and Mesquite Lake faults. The nearest to the Project site is the Pinto Mountain fault, located approximately 1 mile to the north. Ground shaking from the Pinto Mountain fault is estimated to be ≤ 7.2 in Richter magnitude. Potential impacts to the Project as a result of seismically induced ground shaking are dependent on earthquake intensity, duration, and the building's existing conditions.

Although the Project is not located in proximity to an Alquist-Priolo Earthquake Fault Zone or Pinto Mountain fault, the Project is required to adhere and implement earthquake resistant design in compliance with the State and local seismic standards contained in the Building Code. These standards include specific requirements for proximity to fault zones which require reinforcing foundations and walls to resist failure during a seismic event. For this reason, the Project will not expose occupants to unnecessary risk related to seismically induced ground shaking. Impacts are expected to be less than significant.

⁸ SWCA Environmental Consultant, Paleontological Resource Technical Report for San Bernardino County General Plan Update, June 2018.

- a.iii) **No Impact.** According to the geotechnical report, based on the depth of groundwater (greater than 50 feet) in the Project vicinity and relatedly dense alluvial sediment, the risk associated with liquefaction is negligible. In the event of ground shaking, the Project's soil is unlikely to be susceptible to liquefaction. For this reason, no impacts will occur.
- a.iv) **No Impact.** The Project site is located on relatively flat valley floor, where no mountain or hillside is within proximity. No signs of slope instability including landslides, rock falls, mudflow, or slumps were observed at or near the subject site. Based on the field observation, risk associated with slope instability is considered negligible. No impact associated to landslide, slope failure, and rock fall will occur onsite.
- b) **Less Than Significant Impact.** According to the geotechnical report, the site is located within an area determined to be outside the 0.2% annual risk floodplain. Additionally, no signs of flooding or erosion were observed during the field survey. During construction, however, exposed soils will be subject to erosion from both wind and water should a storm occur. The Project will be required to prepare a dust management plan, consistent with the requirements of the MDAQMD to address wind erosion. The standards and requirements of that plan assure that wind erosion is managed through site watering, silt fencing and other measures prescribed by MDAQMD. In addition, the Project will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to control water erosion, and a WQMP, which will include Best Management Practices (BMP) such as bio-swales, sandbags and other means. As a result of these standard requirements, impacts associated with soil erosion will be less than significant.
- c) **No Impact.** No fissures or other surficial evidence of subsidence were observed at or near the Project site at the time of the field survey. No soil instability, subsidence or similar soil issues have been reported on or near the site in the past. Therefore, the potential for subsidence-related settlement from occurring onsite is considered negligible. No impacts are anticipated.
- d) **No Impact.** Based on results from the laboratory test conducted by the geotechnical report, the alluvial materials underlying the site are considered to have a negligible expansive potential because they consist of sandy soils not subject to expansion. No expansive soil was found on-site. No impacts from expansive soil are anticipated.
- e) **Less Than Significant Impact.** Twentynine Palms does not provide commercial wastewater services. All development, including the Project, is required to include a private septic system or on-site treatment plant to fulfill wastewater services. In this case, the Project proposes a treatment plant located north of the hotel units. The Project will be required to submit plans for the plant to the Regional Water Quality Control Board, and secure permits for the plant and its maintenance. These maintenance processes will assure that the Project does not contaminate local soils via its wastewater treatment plant. Impacts will be less than significant.

- f) **Less Than Significant Impact.** The Project's site is currently undeveloped and vacant. Alluvial materials consisting of silty sand and sand are found onsite. No area containing sediment that include finer-grained fluvial, lacustrine, or aeolian deposits, considered suitable to support paleontological resources were found within the development area. The likelihood of paleontological resources being found onsite is low to very low. The Project will result in shallow foundations which will not disturb deep, potentially older soils. The Project will have less than significant impacts on paleontological resources.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|------------------------------|-----------|
| VIII. GREENHOUSE GAS EMISSIONS -- Would the project: | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | X | |

Sources: City of Twentynine Palm General Plan; San Bernardino County Regional Greenhouse Gas Reduction Plan (March 2021); MDAQMD CEQA and Federal Conformity Guidelines; CalEEMod Version 2022.1; project materials.

Environmental Setting

Air quality has become an increasing concern because of human health issues, but also because greenhouse gas emissions are contributing to global warming and climate change. The primary contributor to greenhouse gas emissions is the burning of fossil fuels through the use of automobiles, power and heat generators, and industrial processes.

The principal greenhouse gases (GHGs) include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), and water vapor (H₂O), which are generated by both mobile and stationary sources, including vehicles, electricity and natural gas consumption, and emissions associated with water pumping and application of fertilizers.

The State of California has taken a leading role to curb GHG emissions and has developed laws and regulations to reduce these emissions. State legislation and regulations call for better integrated land use planning and curtailing energy production away from nonrenewable sources and toward new renewable sources, such as solar and wind. California SB 375 in part implements greenhouse gas reduction targets set forth in AB 32 and encourages regional land use planning to reduce vehicle miles traveled; it also requires jurisdictions to adopt a sustainable communities strategy. The California Air Resources Board continues to draft regulations to implement the Scoping Plan.

State law mandated that all cities decrease their GHG emissions to 1990 levels by the year 2020. Executive Order B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050, as set forth in Executive Order S-3-05.

The City does not have a standalone climate action plan. In 2021, SANBAG prepared a Regional Greenhouse Gas Inventory and Reduction Plan (March 2021) which included a greenhouse gas inventory and forecast for Twentynine Palms. The City participated in the plan development and set a goal to reduce its community GHG emissions to a level of 46% below 2008 GHG emissions levels by 2030. The City is expected to meet and

possibly exceed this goal with joint state and local efforts and reduction measures set forth by AB 32. In addition to the Regional Greenhouse Gas Inventory and Reduction Plan, the City's General Plan includes policies and measures to facilitate GHG emission reduction through encouraging alternative transportation, promoting renewable energy, and implementing energy efficient building technologies.

GHG Thresholds

According to the MDAQMD CEQA and Federal Conformity Guidelines, the annual threshold for greenhouse gases is 100,000 tons CO₂e annually, and 548,000 pounds daily. As described above in Section III, Air Quality, the California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to quantify Project air quality emission projections, including greenhouse gas emissions (Appendix A).

Discussion of Impacts

a, b) Less Than Significant Impact. The proposed project will generate GHG emissions during both construction and operation.

Construction

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commutes, material hauling, and other ground disturbing activities. The MDAQMD daily threshold for GHG emissions is 548,000 pounds per day. According to the CalEEMod outputs, daily construction-related GHG emissions would reach a maximum of 6,918 pounds per day, which is substantially below the established threshold. To determine if construction emissions will result in a cumulatively considerable impact, total construction GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 3, below).

Operation

At buildout, there are five emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. According to the CalEEMod outputs, daily operational GHG emissions would reach a maximum of 15,116 pounds per day, which is substantially below the established threshold of 548,000 pounds per day. As shown in Table 3, the project will emit a total of 2,362.7 tons per year which includes annual operational emissions and amortized construction emissions and is substantially below the established threshold of 100,000 tons per year.

| Table 3 Projected GHG Emissions Summary (Metric Tons) | |
|--|--------------------------------|
| Phase | CO₂e (MT/YR) |
| Construction | |
| Construction (2025 and 2026) Total | 471 |
| Operation | |
| Construction: 30-year amortized ¹ | 15.7 |
| Annual Operation | 2,347 |
| Total Operation | 2,362.7 |
| MDAQMD Threshold | 100,000.00 |
| 1. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions. $471/30 = 15.7$ | |

The Project is consistent with the following policies set forth in the San Bernardino County regional Greenhouse Gas Reduction Plan that support the City of Twentynine Palms' GHG reduction measures or would contribute to GHG reductions and sustainable practices in the City:

Energy-1. Building Energy Efficiency

Implementation Policy LU-6.2: Require that new development protect the City's natural resources by implementing sustainable design principles, including, but not limited to, California's Green Building Code standards.

The Project will be developed in accordance with the 2022 CA Green Building Code Standards.

Energy-2. Lighting Efficiency

Implementation Policy CO-6.3: Require lighting in and near residential areas to be minimal and shielded to prevent nuisance glare.

Project proposes limited shielded lighting in accordance with the City's development code.

Energy-5. Renewable Energy - New Commercial/Industrial

Implementation Policy CO-7.1: Use the City's building codes and development code to encourage sustainable construction practices and the use of energy-saving technology within buildings.

The Project will be developed in accordance with the 2022 CA Green Building Code standards.

Water-2. Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency

Implementation Policy: CO-3.13 Adopt regulations to require new development to incorporate features into site drainage plans to reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events.

The Project proposes to keep 110 of the 152-acre site in its natural state. Landscaping will also echo the native landscaping and be drought tolerant.

Implementation Policy: CO-3.2 Require that all new development within the City comply with City, water district and state mandates concerning the conservation and treatment of water.

The Project proposes drought tolerant landscaping. Landscaping plans shall be approved by the City prior to the issuance of building permits to ensure adherence to drought tolerant and water conservation requirements.

Water-3. Water-efficient Landscaping Practices

Implementation Policy: CO-1.8 Encourage developers to preserve, protect and at a minimum salvage naturally occurring desert plant materials for incorporation into project landscaping to the greatest extent possible.

The Project proposes to keep 110 of the 152-acre site in its natural state. Landscaping will also echo the native landscaping and be drought tolerant

Implementation Policy: CO-1.9 Encourage preservation and utilization of on-site indigenous materials on project landscape plans.

The Project proposes to keep 110 of the 152-acre site in its natural state. Landscaping will also echo the native landscaping and be drought tolerant

Implementation Policy LU-3.17 Develop a clear and specific set of architectural and landscape standards and guidelines. The standards/guidelines should address architectural themes, site development, drought tolerant landscaping, and desert friendly irrigation systems for commercial, industrial, and residential developments and State requirements for water efficient landscapes.

The Project proposes drought tolerant landscaping. Landscaping plans shall be approved by the City prior to the issuance of building permits to ensure adherence to drought tolerant and water conservation requirements.

Overall, the proposed Project would be consistent with local, regional and statewide goals and policies aimed at reducing the generation of GHGs. The Project would be required to comply with Title 24 Building Energy Efficiency

Standards (Title 24, Part 6, of the California Code of Regulations), which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage and related GHG emissions. The proposed Project's GHG emissions would not constitute a cumulatively considerable contribution, or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

Mitigation Measures: None.

Monitoring: None.

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

Source: Twentynine Palms General Plan Update (2012). Department of Toxic Substances Control, EnviroStor; Cortese List, accessed February 2024.

Environmental Setting

Products as diverse as gasoline, paint, solvents, household cleaning products, refrigerants, and radioactive substances are categorized as hazardous materials. The proper management of hazardous materials is a common concern for all communities. Beginning in the 1970s, governments at the federal, state, and local levels became increasingly concerned about the effects of hazardous materials on human health and the environment. Numerous laws and regulations were developed to investigate and mitigate these effects. As a result, the storage, use, generation, transport, and disposal of hazardous materials are highly regulated by federal, state, and local laws and regulations.

The San Bernardino County Fire Department's Hazardous Materials Division oversees and regulates businesses in the City that transport, store or use hazardous materials in larger quantities. Sites associated with cleanup of hazardous materials in and near the City have been, and currently are those associated with the military installations at the Marine Corps base, north of the City. The City is responsible for coordinating with the appropriate agencies in the identification of hazardous material sites and regulation of their timely cleanup.

The Project site is surrounded by vacant lands and residential development. The site is currently vacant with the exception of existing water tanks at the southeast corner. No chemical or hazardous waste disposal has been documented on the site. There are no known underground tanks or buried materials on the site.

Discussion of Impacts

a, b) Less than Significant Impact. The construction phase of the Project would involve the use of heavy equipment and vehicles, which will use limited quantities of oil and fuels and other potentially flammable substances. During construction, equipment could require refueling and minor maintenance on site that could lead to fuel and oil spills. The contractor will be required to identify a staging area for storing materials and conducting maintenance, and will be subject to State laws regarding the handling, storage, and use of hazardous materials during construction.

During long-term operation, the Project will involve the routine transport, use, and storage of hazardous materials such as cleaning and degreasing solvents, fertilizers, pesticides, pool maintenance products and similar materials. These will occur in limited quantities and will not require a hazardous material handling/storage permit. The manner in which commercial chemicals are stored and handled is highly regulated by the Fire Department, County and State. These standard requirements will assure that impacts associated with commercial quantities of chemicals will be less than significant.

In addition, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Project. The SWPPP would describe any hazardous materials required for the Project and would include best management practices for prevention of accidental spills as well as cleanup requirements for any accidental spills or releases of hazardous materials into storm flows.

Therefore, compliance with applicable laws and regulations would minimize the potential for the Project to create a significant hazard to the public or the environment, and impacts would be less than significant.

c) No Impact. The nearest existing school is the Twentynine Palms Head Start pre-school on Twentynine Palms Highway, approximately 2.2 miles east of the Project site. The Project site is not within ¼ mile of a school and will not store or transport

significant amounts of hazardous materials, therefore, the Project will have no impact associated with emitting or handling hazardous materials in proximity of a school.

- d) **No Impact.** According to the California Department of Toxic Substances Control EnviroStor database and the State Water Resources Control Board GeoTracker database, the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the proposed Project would not create a significant hazard to the public or the environment. No impact will occur.
- e) **No Impact.** The subject property is not within the boundaries of an airport land use plan or within 2 miles of a public or private airstrip. The site is approximately 11.45 miles west of the Twentynine Palms Airport. Therefore, the Project will not result in a safety hazard or excessive noise for people in the Project area. No impact will occur.
- f) **No Impact.** The proposed Project is required to adhere to the standards set forth in the Uniform Fire Code, which identifies the design standards for emergency access during both the Project's construction and operational phases. A traffic control plan will be developed prior to the initiation of any construction activities to minimize disruption to existing traffic flow conditions along emergency access routes. Adequate local and emergency access to adjacent uses is required to be provided at all times. The traffic control plan shall also be reviewed and approved by the Fire and Police departments so that construction does not create any hazards or interfere with any emergency response or evacuation plans. Adherence to City requirements regarding traffic control plans will ensure potential impacts to emergency access during construction will be less than significant.

Once operational, the proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities. The proposed Project would not impair implementation of or physically interfere with an adopted Emergency Response Plan or Emergency Evacuation Plan, because it will not modify any existing evacuation routes, and will improve Lear and Sullivan to carry emergency vehicles. Therefore, the Project would have no impact on evacuation planning.

- g) **No Impact.** The subject property is not located in or near a state responsibility area or lands classified as a Very High Fire Hazard Severity Zone. The site is sparsely vegetated, has sandy soils and provides no substantial fire fuel source. The Project will not expose people or structures to a significant risk associated with wildfire hazards. No impact will occur.

Mitigation Measures: None.

Monitoring: None.

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

Sources: Twentynine Palms General Plan; Twentynine Palms Water District 2020 UWMP Update, June 2021.

Environmental Setting

Domestic Water

Twentynine Palms Water District (TPWD) manages and distributes the local ground water supply in the City of Twentynine Palms and portions of the surrounding unincorporated areas of San Bernardino County. The District's water service area spans 87 square miles, maintaining 200 miles of pipeline and 17 million gallons of water storage capacity. The District's water supply source is 100 percent local groundwater extracted from four sub-basins south of the Pinto Mountain Fault, which are fed by rainfall in the Pinto Mountains.

The District overlays portions of the Indian Cove, Eastern and Fortynine Palms sub-basins of the Joshua Tree Basin, and part of the Twentynine Palms Valley Basin.

As an urban water supplier, TPWD is mandated to prepare an Urban Water Management Plan (UWMP) per the California Water Code, undertaking water supply planning over a 20-year period in five year increments by analyzing existing and projected water supply opportunities including recycled water for existing and future demands, in normal, single-dry and multiple-dry years, and implementing conservation and efficient use of urban water supplies.

State Water Code Section 10910(a) states that any city or county that determines that a "Project," as defined in Water Code Section 10912, shall prepare a water supply assessment. The threshold defined by the Water Code is 500 dwelling units, 500,000 square feet of commercial development, or any project with a water demand equivalent to 500 dwelling units. The project water demand is analyzed below, and does not require the preparation of a water supply assessment because it does not meet the Water Code threshold of 500 equivalent dwelling units.

Wastewater Treatment

The only Wastewater Treatment Plant (WWTP) in the region is located at the Marine Corps Air Ground Combat Center (MCAGCC). The facility treats all wastewater generated from the Mainside area of the MCAGCC. The City, including the Project area, does not have a sanitary sewer system and currently operates with septic tanks and project-specific treatment, or "package" plants. The Project proposes an on-site package treatment plan.

Flood Control/Drainages

The City, including the Project site, is located in the southern Mojave Desert. With an average precipitation of 5 inches per year, the area sees infrequent thunderstorms that can cause flooding in the City.

Twentynine Palms Channel, the only major drainage structure in the City, was designed and constructed to protect the central business district and downtown area. The natural major drainages of Fortynine Palms Canyon, Twentynine Palms Wash, Indian Cove and Dog Wash, as well as small unnamed drainages in the Pinto Mountains can carry flash floods and impact downstream development in the City.

The San Bernardino County Flood Control District (SBFCD) is responsible for managing regional drainage within and in the vicinity of Twentynine Palms. The City works with SBFCD to manage local drainages in the City, which are divided between well-defined drainage courses (some have been channelized) and areas of wide sheet flow. Development that may alter the direction of flow onsite are conditioned per standard San Bernardino County practices to maintain the existing site drainage patterns at inlets and outlets.

The project site will be subject to City requirements relating to flood control. The City implements standard requirements for stormwater retention and participates in the National Pollution Discharge Elimination System (NPDES) to protect surface waters from pollution. Development projects must retain the 100-year storm flow onsite.

Water Quality

Water quality is regulated by multiple agencies, depending on the source. The TPWD implements the standards of the Regional Water Quality Control Board (RWQCB) in its distribution of domestic water.

Surface water quality in the region is largely under the influence of land uses that affect runoff, such as residential and commercial uses. Runoff from stormwater can transport pollutants that collect on the ground surface and affect water quality of receiving streams, rivers, and channels.

Description of Impact

- a) **Less Than Significant Impact.** All water providers are required to comply with Regional Water Quality Control Board (RWQCB) standards for the protection of water quality and local aquifers. The City and RWQCB impose requirements for surface water protection, including the preparation of site-specific Water Quality Management Plans (WQMP) for surface waters.

Effluent from the water treatment system will be contained in closed systems, and they are not expected to degrade groundwater quality. The RWQCB Colorado River Region 7 typically requires the effluent to meet specific concentration levels for project parameters, which assures that the treatment plant operates properly to remove necessary pollutants and protects the surface waters and groundwater that receive the effluent. The RWQCB Colorado River Region 7 Board will permit the WWTP and develop Waste Discharge Requirements (WDR) with specific effluent concentrations for materials of concern. It will also be responsible for ongoing inspections, reporting and conformance checks.

To minimize the pollutant load associated with urban runoff, the Project will also be required to comply with NPDES regulations, including preparation of a Storm Water Pollution Prevention Plan (SWPPP). Adherence to conditions of approval and local, state, and federal standard requirements will assure that the Project will not violate any water quality standards or waste discharge requirements or conflict with any water quality control plan or sustainable ground water management plan. Project impacts will be less than significant.

- b) **Less Than Significant Impact.** During construction, water demand will be limited and temporary and used for dust control purposes, including the routine spraying of ground surfaces and construction equipment. During operation, water will be used for typical hotel purposes, employee housing, drought-tolerant landscape irrigation, and public spaces and facilities, such as swimming pools or splash pads.

The projected indoor commercial (hotel) usage is based on the American Water Works Association Research Foundation's (AWWARF's) Commercial and Industrial End Uses of Water. For residential water demand (employee housing) SB 606 and AB 1668 established guidelines for efficient water use and a framework for the implementation and oversight of the new standards. Based on results of the Indoor Residential Water Use Study, DWR and the State Water Resources Control Board jointly recommended that the indoor residential standard remain at 55 gallons per capita per day (gpcd) through 2024 and decline to 47 gpcd in 2025 and to 42 gpcd in 2030. The projected outdoor irrigation water usage is based on the Maximum Applied Water Allowance (MAWA) equation, which meets the water conservation goals of the California Department of Water Resources (DWR) Model Efficient Landscape Ordinance (MELO).

| Table 4 Project Water Demand Projects | | | | |
|---|------------------------|----------------------------------|------------------------------------|--------------------------------------|
| Land Use | Area/Quantity | Water Demand Factor | Annual Water Demand (gallons/year) | Annual Water Demand (acre-feet/year) |
| Hotel | 100 rooms | 115/gal/day/room ¹ | 4,197,500 | 12.88 |
| Employee Housing | 25 units/occupants | 47 gal/day/occupant ² | 428,875 | 1.32 |
| Native Desert Landscaping | 43,560 SF ³ | See Footnote 4 | 6,354,929 | 19.5 |
| Total | | | | 33.7 AF/YR |
| 1. Water demand factor for office use was derived from the American Water Works Association Commercial and Institutional End Uses of Water. 2. CA Indoor Water Use Performance Standard 3. Assumes 15% (6.3) of developed Project area (42 acres) will be drought tolerant landscaping. 4. Outdoor water demand calculations based on landscape SF, Evapotranspiration (ET _o), Evapotranspiration Adjustment Factor (ETAF), and Conversion Factor (gal/SF). Landscape (SF) x ET _o (in/yr) x ETAF x Outdoor Conversion Factor, or 274,428 SF x 83 (inches) x 0.45 x 0.62 | | | | |

According to the 2020 Twentynine Palms UWMP, the Twentynine Palms Water District's (District) projected 2025 water demand is 2,660 AFY, and the projected 2045 water demand is 3,200 AFY (UWMP Table 2-8). The projected 2025 water production is 3,048 AFY, and the projected 2045 water production is 3,660 AFY (UWMP Table 2-9). The proposed Project's water demand (33.7 AFY) represents a 1.3% increase of projected 2025 water demand and 1.05% increase of projected 2045 District water supplies. However, the Project's projected water demand increase is well within the District's projected water supply projections for 2025 and 2045. Therefore, the Project will not substantially decrease local groundwater supplies or interfere with groundwater recharge such that it would impede sustainable management of the basin. The Project includes irrigation requirements, including the use of water-efficient fixtures and drought-tolerant landscape materials, which will help reduce water demand over the long term. Impacts will be less than significant.

The Project will also be required to comply with conditions of approval pertaining to discharge, standard stormwater management requirements, and project-specific Best Management Practices (BMPs) and a Water Quality Management Plan (WQMP) that are subject to approval by the City Engineer and required by the City's NPDES implementation agreement. Implementation of the WQMP and BMPs will reduce impacts to surface waters by reducing siltation and reducing or eliminating pollutants in storm flows, including pathogens (bacteria/virus) generally associated with human activities but also present in the environment. With the implementation of these measures, impacts associated with surface water pollution will be less than significant.

Adherence to City requirements, including WQMP BMPs, will ensure the Project will not result in erosion or siltation on- or off-site. Implementation of these and other applicable requirements will assure that the Project will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

c i-iv) Less than Significant Impact with Mitigation. A Preliminary Off-Site Drainage Study (Appendix F) was prepared for the Project by NV5 in 2024 that included the hydrologic analyses of approximately 472 acres of upstream offsite water that will impact the Project site. According to the study, the property slopes from the south towards the north with approximate slopes of 5%. The offsite drainage area to the south is similarly undeveloped desert terrain with scattered native plants. This area slopes towards the project site from south to north with approximate slopes of 5%.

The Preliminary Drainage Study determined that the 100-year, 24-hour peak discharge values at the most downstream point for the off-site basin is 487 cfs (cubic feet per second), and runoff would impact the Project site along the southerly boundary of the property. The Study determined that development of the Project could be achieved in a manner that would maintain historical downstream flow patterns assuming the following mitigation measures, as set forth in Mitigation Measures HYD-1:

1. Proposed finished floor elevations for the development shall be determined by the Final Drainage Study. Finished floor elevations for the proposed buildings should be located at a minimum of 1' above the highest ground elevation beneath the building footprint.
2. A Final Drainage Study shall address any modification or changes for the offsite and onsite drainage conditions. The Preliminary Drainage Study only addresses the existing offsite watershed basins.
3. Proposed retention basin design will be determined during final design based upon the final drainage study. Proposed retention basins should be sized to retain, at a minimum, the incremental increase in storm water runoff volume.
4. Runoff should follow existing drainage patterns when leaving the site.

With implementation of this mitigation measure, impacts associated with on- and off-site storm flows will be less than significant.

- d) **Less than Significant Impact with Mitigation.** The subject property is designated Zone X (FIRM map number 06071C8175H dated September 2, 2016). A Zone X is defined as areas determined to be outside of the 0.2% annual chance of flood or a 1% annual chance of flood with average depths of less than 1' or with drainage areas less than one square mile. The site is not located in a 100-year or 500-year FEMA Flood Zone. Implementation of Mitigation Measures HYD-1 will require a Final Drainage Study be prepared that will ensure on-site retention basins are designed to retain, at a minimum, the incremental increase in storm water runoff volume.

The Project will also be required to comply with conditions of approval pertaining to discharge, standard stormwater management requirements, and project-specific BMPs and a WQMP that are subject to approval by the City Engineer and required by the City's NPDES implementation agreement. Implementation of the WQMP and BMPs will reduce impacts to surface waters by reducing siltation and reducing or eliminating pollutants in storm flows, including pathogens associated with human activities but also present in the environment. With the implementation of these measures, impacts associated with surface water pollution will be less than significant.

- e) **No Impact.** The proposed Project will be required to comply with all applicable water quality standards approved by the City and the Regional Water Quality Control Board for both construction activities and long-term operation of the Project. The proposed Project will not significantly increase water demand as addressed in the UWMP. Therefore, it will not conflict with a sustainable groundwater management plan. Adherence to the RWQCB and City's standard requirements related to water quality will ensure there will be no impact to a water quality control plan.

Mitigation Measures:

HYD-1 To assure that on- and off-site drainage do not redirect storm flows or cause surface water pollution, the following actions will be required in final Project design:

1. Proposed finished floor elevations for the development shall be determined by the Final Drainage Study. Finished floors elevations for the proposed buildings should be located at a minimum of 1' above the highest ground elevation beneath the building footprint.
2. A Final Drainage Study shall address any modification or changes for the offsite and onsite drainage conditions. The Preliminary Drainage Study only addresses the existing offsite watershed basins.

3. Proposed retention basin design will be determined during final design based upon the final drainage study. Proposed retention basins should be sized to retain, at a minimum, the incremental increase in storm water runoff volume.
4. Runoff should follow existing drainage patterns when leaving the site.

Monitoring:

HYD-A A Final Drainage Study shall be reviewed and approved by the City prior to the issuance of grading permits.

Responsible parties: Project engineer, Planning Division, City Engineer.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| XI. LAND USE AND PLANNING - Would the project: | | | | |
| a) Physically divide an established community? | | | | X |
| b) 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | | | X | |

Sources: Google Earth; City of Twentynine Palms General Plan; project materials.

Environmental Setting

Under the City's 2012 General Plan Land Use Map, the site's land use/zoning designation is Single-Family Residential-Estate. The Project is proposing a General Plan Amendment and Rezoning to redesignate ±42 acres of the site to Tourist Commercial and the remaining ±110 acres to Open Space Conservation. The Project's redesignation will result in a potential loss of up to 61 residential units.

Currently, property to the west of the site is designated Single-Family Residential-4 and to the east is Single-Family Residential-Estate. No development has occurred to the north or south of the site; nonetheless, land to the north is designated Rural Living-2.5 and to the south is Rural Living-5.

Discussion of Impacts

- a) **No Impact.** The development of the Project would result in a 100 room resort on a parcel approximately 152 acres in size. The subject property is a currently undeveloped, vacant parcel. The surrounding environment consists of single-family residential development to the west, a single family home and vacant land to the east, and vacant, undeveloped lands (similar to the Project site) to the north and south. The existing residential development operates independently of the site, and will not be impacted by Project development. Improvements to Lear Avenue will facilitate safer travel along this roadway for existing residents to the west. For these reasons, no impacts are anticipated.
- b) **Less Than Significant Impact.** The Project is located in the southwest portion of the City of Twentynine Palms. As part of an incorporated area, the Project is subject to the City's regulations and standards related to its designated land use/zoning.

As described above, the Project is proposing a GPA, DCA and REZ to redesignate the central 42 acre portion of the site to CT and the outer 110 acres to Open Space, to allow for the establishment of a conservation area. The property is subject to the

goals, policies and programs of the City of Twentynine Palms General Plan. In order to support the GPA, DCA and REZ, consistency with the General Plan must be demonstrated. The following analyzes the goals, policies and programs in the Land Use Element of the General Plan.

Goal LU-1 Encourage orderly growth and development as envisioned by community residents.

Policy LU-1.4 General Plan Amendment (GPA) applications shall be accompanied by a development proposal, as stand-alone GPA's shall be denied.

Policy LU-1.5 General Plan Amendments shall only be approved if they can demonstrate that the proposed amendment will not adversely impact the existing community and the amendment will help achieve the vision and goals established by the General Plan.

Policy LU-1.7 "Spot zoning" shall be prohibited and all land use requests shall meet the minimum contiguous land area specified in Table LU-5.

Analysis: The GPA, DCA and REZ are proposed for a specific project: a 100-room cabin-style hotel clustered on the central 42 acres of a 152 acre parcel. The requested GPA would result in the continued orderly growth on the City's Highway 62 corridor, while providing a minimum 500 foot Open Space buffer, and up to 800 feet, adjacent to residentially zoned and occupied parcels.

The location of a tourist-oriented project on Highway 62 is consistent with the City's pattern of locating and concentrating commercial land uses along this high-volume corridor. Commercial lands and uses occur both east and west of the project site, and the project would continue this pattern of development with minimal intrusion into residential areas, particularly because of the Open Space buffer proposed as part of the amendment.

The hotel project itself is single-story, low impact development of individual cabins for guests, and employee housing to assure that employees have affordable housing and are not required to commute. The 100 cabins represent a density of 2.4 units per acre, which is lower than the neighborhood currently developed on the west side of Lear Avenue adjacent to the project site. The implementation of the GPA will also implement the City's economic development goals, including local revenue and employment, while minimizing and buffering residents to the south, west and east (please see further discussion below).

Goal LU-2 Protect existing neighborhoods and the area's natural surroundings by encouraging development that is compatible with the City's small-town character.

Policy LU-2.3 Require that new development be sensitive to neighborhood context and development scale.

Policy LU-2.4 Discourage development extremes, such as, but not limited to, the construction of multi-story buildings immediately adjacent to single-family residences.

Analysis: The proposed GPA protects existing neighborhoods by creating a permanent Open Space buffer – 500 feet deep on the west and south, 600 feet deep on the north and 800 feet deep on the east – between the existing residential neighborhood to the west, and the residentially designated lands to the east and south. The project itself consists of individual cabins, which are low profile single story structures. The amenities in the project are geared toward recreation, including a playground area for children, star gazing area, and an outdoor movie screen.

The intensity of the project is lower than that of the neighborhood to the west, which allows and has developed at a density of up to 4 units per acre. In addition, the Open Space buffer proposed on all sides will assure that the project will be neither visible nor audible to the existing homes on the west and east.

Goal LU-3 Promote a high quality of life by encouraging attractive high quality development that is compatible with existing uses and the City's desert environment.

Policy LU-3.11 Preserve, protect and maintain open space, parks and recreation facilities as desirable land uses, recognizing that such uses contribute to the high quality of life in Twentynine Palms.

Policy LU-3.12 Encourage economically successful commercial and industrial centers that are functional, safe, attractive and convenient to users, and which will strengthen the local economy.

Policy LU-3.13 Encourage the transition of incompatible, ineffective and/or undesirable land uses to attractive land uses that will provide high quality residential, commercial or industrial developments.

Analysis: The project site is located on Highway 62, and as such lends itself to commercial development similar to that which occurs or is planned along the highway in the City. The project proposes low-slung, single story buildings made of high quality, desert compatible materials that will blend into the natural setting created by the Open Space buffer. The Open Space buffer is proposed for preservation, not development, and will provide a permanent natural setting and view for existing and future development on the west, south and east of the site.

The proposed project will create new jobs at multiple economic levels in the City, and will generate both property tax and transient occupancy tax, which will support and strengthen the City's economy.

Goal LU-4 Adequately address the potential impacts of new development on the existing community and the City's infrastructure system.

Policy LU-4.1 Consider and address the potential impacts of new development on surrounding properties.

Policy LU-4.6 Encourage development that complements the circulation and infrastructure network, meets the circulation demand of residents and businesses, and provides opportunities for non-automobile circulation.

Analysis: *The project has access to all infrastructure, with the exception of sanitary sewer. The project includes an on-site wastewater treatment plant, which will be overseen by the Regional Water Quality Control Board and maintained to their standards. Furthermore, the site is located on existing paved roadways, and will improve Lear Avenue to current standards, from its currently sub-standard condition.*

The project will have no significant impact on surrounding properties, because of the low intensity (2.4 units per acre) of the project, and the creation of the Open Space buffer, which will provide a permanent physical separation between the project and existing and future residential uses on the west, south and east.

The project will be self-contained, and with the creation of the Open Space buffer will not be visible to surrounding development. Once on-site, guests will park in a central lot near the reception building, and will not use their vehicles further for access to their rooms and recreational facilities. This will be accomplished through a system of walkways and trails that interconnect the cabins and other facilities, to minimize motorized circulation.

Goal LU-6 Promote development of a well-balanced community that can adequately meet the needs of future residents and promotes economic development.

Policy LU-6.1 Promote orderly growth and development through smart growth and planning principles.

Policy LU-6.2 Require that new development protect the City's natural resources by implementing sustainable design principles, including, but not limited to, California's Green Building Code standards.

Policy LU-6.3 New development shall be required to pay for its fair share of infrastructure needs and services to avoid burdening existing residents.

Policy LU-6.5 Encourage development that creates employment opportunities in the City.

Analysis: The project proposes to cluster development at the center of the 152± acres in order to preserve as much of the site as possible. It will provide jobs and tax revenue to the City to support services, including public safety, parks and recreation and other services from which the entire community will benefit. By creating on-site recreational facilities, the project limits potential impacts to existing City parks and recreation, while increasing the customer base for local businesses.

The project will be built to conform with or exceed all Building Code requirements in place at the time that building permits are issued, including the provision of solar power generation, energy and water efficient fixtures, and drought tolerant, desert-compatible landscaping.

The project will be subject to the City's developer impact fees, and is proposing the widening of Lear Avenue on its side of the street in order to create a buffer with the existing homes to the west which have not benefitted from public street improvements on the west side of Lear.

Goal LU-7 Protect and preserve Twentynine Palms natural resources, promote the existing quality of life and prepare for future residents and businesses by promoting superior sustainable development.

Policy LU-7.1 New development shall be designed in a manner that sound land use, transportation and economic development policies are implemented.

Policy LU-7.2 Development shall be sustainable in its use of land and shall limit impacts to natural resources, energy, and air and water quality.

Policy LU-7.3 Encourage a mix of retail, service, industrial, manufacturing and professional uses that create diverse, well-paying employment opportunities.

Analysis: The creation of 500, 600 and 800 foot buffers on all sides of the project, and the preservation of these lands as Open Space, will assure the preservation of natural resources, including habitat for locally significant species. Although the site does not border the Joshua Tree National Park, the buffer on the south side of the site, and the clustered units in the center assure that there will be no impact from the project to the National Park.

The project's buildings are all single-story, with the cabins being less than that, and located in clusters at the center of the site and minimizing the impacts to the land. The project avoids the stream beds occurring on the east half of the site, in order to assured continued natural flows through the site.

The site is located on Highway 62, which has been and continues to be the City's commercial corridor. The location of a hotel at this location is consistent with other hotels located east of the site, which also occur on the highway. This location allows for easy access by employees who may live in the City. In addition, the employee housing proposed as part of the project will limit daily employee trips, and also provide an affordable living environment for employees who might not be able to afford market rents and purchase prices in the City otherwise.

Goal LU-10 Promote a high quality of life for Twentynine Palms residents by developing and sustaining a strong and diverse local economy.

Policy LU-10.1 Encourage land use decisions that are fiscally responsible and positively affect the City's economic health by creating jobs, generating tax revenue and involving private capital investment.

Analysis: The Map Amendment will facilitate the development of a revenue-generating hotel that will support the quality of life of residents by providing funds to the City's General Fund, while having a minimal impact on surrounding residents. The guests at the hotel will shop and eat at local businesses, thereby improving their quality of life as well. The funding for the project will be entirely through private investment, vesting the developer in the community.

The Project will comply with all development standards and regulations applicable to the Tourist Commercial zone. As such, the Project will be consistent with standards, regulations, and policies stated in the City's General Plan and Municipal Code. The Project is not expected cause environmental effects related to the violation local regulations. For this reason, less than significant impacts will occur.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|------------------------------------|--------------|
| XII. MINERAL RESOURCES – Would the project: | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | | X |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | | | | X |

Sources: Google Earth; City of Twentynine Palms General Plan.

Environmental Setting

The City is not identified as a mineral resource area of significance, although mining has occurred in and around the City in its history. The General Plan uses the State's mineral resource designations to determine the potential for mineral resources to exist in any given area.

Discussion of Impacts

a), b) No Impact. The Project site is currently undeveloped. According to the General Plan there are no known significant minerals within the City or Sphere of Influence. The Project area is not, nor has it been in the past, a mining site. There are no mines located in the vicinity of the Project. There will be no impact.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| XIII. NOISE – Would the project result in: | | | | |
| a) Generation of 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? | | | X | |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | | | X | |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | | | | X |

Sources: Google Earth; City of Twentynine Palms General Plan; Ofland 29 Palms Noise Impact Analysis, prepared by Urban Crossroads January 11, 2024.

Environmental Setting

The main sources of noise in an urban environment include road traffic, aircraft, railroads, construction, industry, noise in buildings, and consumer products. According to the United States Environmental Protection Agency (US EPA), in any city, the main sources of traffic noise are the motors and exhaust systems of autos, trucks, buses, and motorcycles. Temporary noise sources include landscape maintenance activities, home stereo systems, and barking dogs.

The City has established goals, policies, and programs to limit and reduce the effects of noise intrusion on sensitive land uses and set acceptable noise levels for varying types of land uses in its General Plan. The City uses the Community Noise Equivalent Level (CNEL) to guide acceptable noise levels in the community. The City of Twentynine Palms Code, Title 19 Development Code, Section 19.80.070(a) establishes the noise level standards for noise sources as shown in the Table below.

| Table 5 City Noise Level Standards | | |
|---|--|---------------|
| Affected Land Use (Receiving Noise) | Noise Level | |
| | Interior CNEL | Exterior CNEL |
| Residential Districts (RL, RS, RM, R-HD, OSR) | 45 dBA | 65dBA |
| Residential within Mixed Use | 30 dBA Outdoor to Indoor Noise Reduction | - |

| Table 5 City Noise Level Standards | | |
|---|----------------------------------|----------------------|
| Affected Land Use (Receiving Noise) | Noise Level | |
| | Interior CNEL | Exterior CNEL |
| Office Commercial District (CO) and Public District (P) | 45 dBA | - |
| Other Commercial Districts (CN, CG, CT, CS) | 45 dBA | - |
| Community Industrial (IC) | 70 dBA | - |
| Open Space | - | 65 dBA |
| Military (M) | As determined by Base Command | - |

City of Twentynine Palms Municipal Code Chapter 19.80.070(A)

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of operational noise increases attributed to projects. FICON identifies a readily perceptible 5 dBA or greater project-related noise level increase as a significant impact when the noise criteria for a given land use is exceeded. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. These standards were used in developing the noise impact analysis described below.

For construction noise, the Federal Transit Administration (FTA) considers a daytime exterior construction noise level of 80 dBA Leq as a threshold for noise sensitive residential land use, and a noise level of 85 dBA Leq for commercial locations.

Urban Crossroads prepared a noise impact analysis for the proposed Project (Appendix G). Its findings are summarized in the analysis below.

Discussion of Impacts

- a) **Less than Significant Impact.** The subject property is currently vacant and undeveloped. The main noise source in the area is vehicular traffic on Twentynine Palms Highway. The surrounding area mainly consists of single-family residential development and vacant lands. The nearest sensitive receptors are the single-family residences immediately west of Lear Avenue.

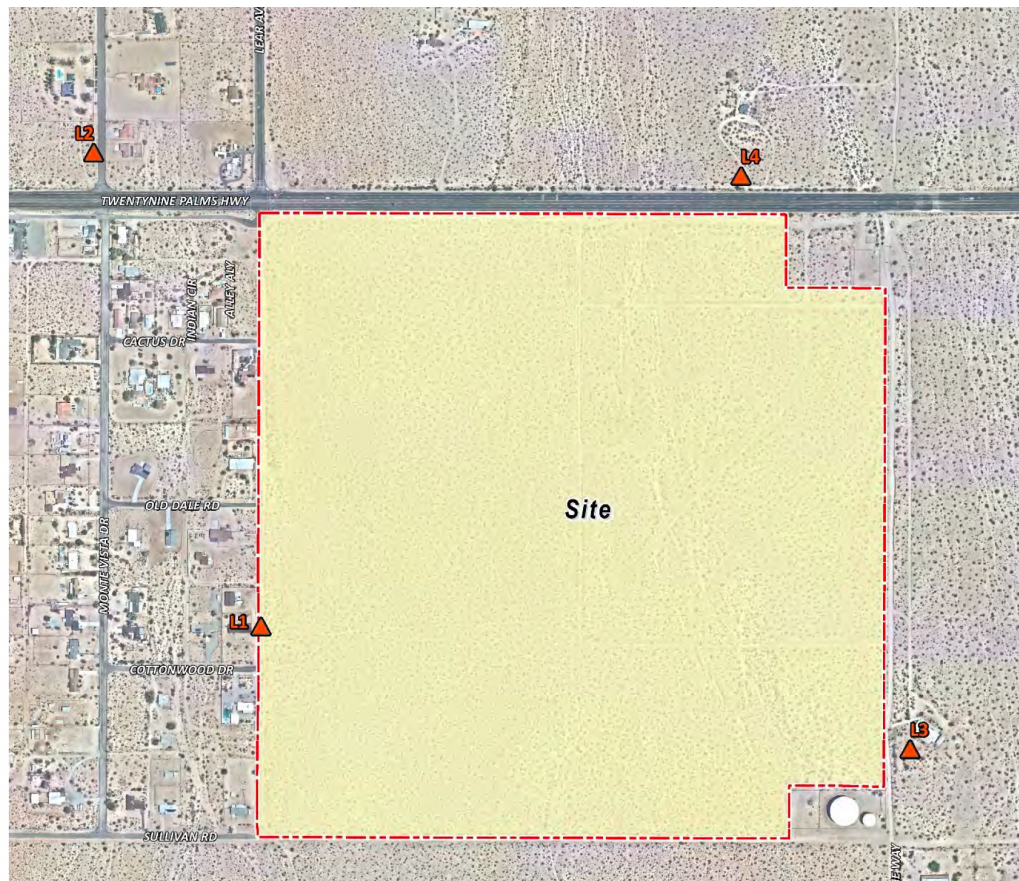
Existing Noise Levels

The noise study measured noise levels during typical weekday conditions over a 24-hour period to describe the daytime and nighttime hourly noise levels. Reference ambient noise level measurements were collected at the nearby sensitive receiver locations to assess potential noise impacts due to the Project's contribution to the ambient noise levels. Table 5, below, shows the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at

each of the four noise level measurement locations analyzed in the noise study. The location of the monitoring sites is shown in the figure below, and provided in Exhibit 5-A of the noise study.

| Table 6 Existing Noise Levels | | | |
|--|---|---|-----------|
| Location | Description | Average Noise Level (dBA L_{eq}) ² | |
| | | Daytime | Nighttime |
| L1 | Located west of the site near the residence at 69262 Cottonwood Drive | 48.0 | 45.7 |
| L2 | Located northwest of the site near the residence at 6461 Monte Vista Ave. | 63.3 | 60.5 |
| L3 | Located southeast of the site near the residence at 69711 Shoshone Valley Road | 51.3 | 41.8 |
| L4 | Located northeast of the site near the residence at 6202 Twentynine Palms Highway | 60.0 | 59.9 |

Source: Table 5-1 24-Hour Ambient Noise Level Measurements, Project Noise Study, 2024.



Construction Noise

Noise generating construction activities would include site preparation, excavation, grading, the construction and finishing of the proposed buildings, and paving. Noise levels surrounding the Project site could be elevated for short periods of time, as equipment moves through the site. These noise levels would be limited to

the less sensitive daytime hours and would cease once building construction ended. Construction activities will comply with the City's Municipal Code Section § 19.80.100 which exempts construction activities from the noise level standards between the hours of 7:00 a.m. to 7:00 p.m. except on Sundays and Federal holidays.

The noise analysis sensitive noise receiver locations to analyze potential noise impacts from construction activities. Results of the analysis are as follows:⁹

R1: Approximately 14 feet west of the site: Highest level: 63.3 dBA Leq
R2: Approximately 152 feet northeast of the site: Highest level: 56.6 dBA Leq
R3: Approximately 418 feet west of the site: Highest level: 55.8 dBA Leq
R4: Approximately 112 feet south of the site: Highest level: 59.2 dBA Leq
R5: Approximately 395 feet south of the site: Highest level: 54.9 dBA Leq

Results of the construction noise analysis show that the nearest receiver locations will be 16.7 to 25.1 dBA Leq below the daytime 80 dBA Leq significance threshold established by the FTA, and therefore impacts due to Project construction noise is considered less than significant.

Operational Noise

At buildout, principal Project-related noise sources will include air conditioning units, outdoor activities, music, an outdoor movie screen, trash enclosure activity, and parking lot activity. According to the project application, background music will be played in the main and secondary lodges throughout the day from 6:00 a.m. to 10:00 p.m. on small satellite speakers. The audio for the outdoor movie area is broadcast by personal FM radios or mobile apps. No central loudspeakers will be used on-site. Operational noise levels were evaluated against the City's exterior noise level thresholds at the five nearby noise-sensitive receiver locations listed above.

Off-Site Noise Impacts

According to the noise study, Project operational noise levels at the off-site receiver locations are as follows:

- Daytime operational noise levels would range from 33.4 to 38.5 dBA Leq;
- Nighttime operational noise levels would range from 25.8 to 32.5 dBA Leq; and
- The 24-hour CNEL would range from 34.0 to 40.1 dBA CNEL.

These noise levels are low due to the relatively quiet on-site activities, and the distance between the developed portion of the Project and the sensitive receptors. The City's exterior noise level standards for residential uses (sensitive receivers) are 55 dBA Leq during the daytime hours and 45 dBA Leq during nighttime hours.

⁹ Table 11-3 Construction Noise Level Compliance, "Ofland 29 Palms Noise Impact Analysis," prepared by Urban Crossroads January 11, 2024. See Appendix G of this Initial Study.

Results of the noise analysis show Project operational noise levels would not exceed these standards. Therefore, impacts are considered less than significant.

The Project operational noise levels are combined with the existing ambient noise levels measurements for the nearest off-site receiver to evaluate the ambient operational noise level increases in the Project area. As shown in the Table below, the Project will generate daytime and nighttime operational noise level increases ranging from 0.0 to 0.2 dBA Leq at the nearest receiver locations.¹⁰

| Table 7 Project Operational Noise Level Increases | | | | | | | |
|--|---------------------------------------|----------------------|--------------------------------|------------------------------|------------------|-------------------|-----------------------------|
| Receiver Location | Total Project Operational Noise Level | Measurement Location | Reference Ambient Noise Levels | Combined Project and Ambient | Project Increase | Increase Criteria | Increase Criteria Exceeded? |
| R1 | 40.1 | L2 | 63.3 | 63.3 | 0.0 | 3 | No |
| R2 | 35.2 | L1 | 48.0 | 48.2 | 0.2 | 5 | No |
| R3 | 34.5 | L4 | 60.0 | 60.0 | 0.0 | 3 | No |
| R4 | 35.9 | L3 | 51.3 | 51.4 | 0.1 | 5 | No |
| R5 | 34.0 | L3 | 51.3 | 51.4 | 0.1 | 5 | No |

As described above, for a noise level increase to be considered substantial, a project would need to increase ambient noise levels by more than 5 dBA CNEL if existing conditions are less than 60 dBA CNEL, more than 3 dBA CNEL if existing conditions are 60-65 dBA CNEL, and more than 1.5 dBA CNEL if existing conditions are greater than 65 dBA CNEL. Therefore, Project-related operational ambient noise level increases will be well below these thresholds, will not be perceptible, and Impacts are considered less than significant.

Transportation Noise

On-Site Transportation Noise

The primary source of exterior transportation noise affecting the Project site is anticipated to be from SR-62/Twentynine Palms Highway. According to the noise analysis, and per the City's General Plan land use compatibility standards, noise levels of up to 65 dBA CNEL are "acceptable" for residential districts. Results of the noise analysis indicate that the Project building façade nearest to SR-62 is anticipated to experience an unmitigated exterior noise level of 59.9 dBA CNEL, which does not exceed the land use compatibility noise thresholds.

To evaluate interior transportation noise impacts, the noise analysis relies on the acceptable 45 dBA CNEL interior noise limit for new construction. A noise level greater than 57 CNEL at a building façade will require a windows-closed condition and would require mechanical ventilation (e.g. air conditioning). Since the Project

¹⁰ Table 10-5: Daytime Project Operational Noise Level Increases and Table 10-6: Nighttime Project Operational Noise Level Increase, Project Noise Study. See Appendix G of this Initial Study.

would experience an unmitigated exterior noise level of 59.9 dBA CNEL and will be providing air conditioning on all units, offices, and meeting spaces, to satisfy the 45 dBA CNEL interior noise level standard for interior uses, standard windows with minimum STC ratings of 27 for all windows will suffice, and the interior noise level standards would be met. Therefore, no mitigation is required to assure that interior noise level impacts are below the City's threshold, and impacts will be less than significant.

Off-Site Transportation Noise

According to the Project traffic study, the Project is anticipated to generate a maximum of 894 external vehicle trip-ends per day with 53 external AM peak vehicle hour trips and 58 external PM peak hour vehicle trips, which would represent an incremental increase to the 25,300 existing average daily traffic volume on SR-62. The noise study determined that the increase to the existing daily traffic on Lear Avenue north of Cactus Drive would not be perceptible due to the dominant traffic noise generated by SR-62. Due to the low traffic volumes generated by the Project and the dominant noise source of existing traffic on SR-62, the off-site traffic noise impacts are considered less than significant.

- b) Less Than Significant Impact.** Groundborne vibration would produce groundborne noise, which is often described as a rumbling sound. During construction of the proposed Project, ground-borne vibration and/or ground-borne noise would be generated, which could be felt by adjacent land uses. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type.

The noise analysis used the vibration assessment methods defined by the Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. The same five receiver locations described above were used to analyze vibration-related impacts. Based on the City's maximum acceptable continuous vibration threshold of 0.2 PPV (in/sec), the noise analysis found that typical Project construction vibration levels would not exceed the thresholds at all receiver locations, as shown in the Table below.

| Table 8 | | | | | | | | |
|--------------------------------------|------------------------------------|---|------------|------------------|--------------------|-------------------------------|-------------------------------|-------------------------|
| Construction Vibration Levels | | | | | | | | |
| Receiver | Distance to Const. Activity (Feet) | Typical Construction Vibration Levels PPV (in/sec) | | | | | Thresholds PPV (in/sec) | Thresholds Exceeded? |
| | | Small bulldozer | Jackhammer | Loaded Trucks | Large bulldozer | Highest Vibration Level | | |
| R1 | 514' | 0.000 | 0.000 | 0.001 | 0.001 | 0.001 | 0.20 | No |
| R2 | 652' | 0.000 | 0.000 | 0.001 | 0.001 | 0.001 | 0.20 | No |
| R3 | 918' | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.20 | No |
| R4 | 612' | 0.000 | 0.000 | 0.001 | 0.001 | 0.001 | 0.20 | No |
| R5 | 895' | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.20 | No |

It is expected that ground-borne vibration from project construction activities would cause only intermittent, localized intrusion due to heavy construction equipment and trucks, at levels well below the threshold. The City will require that construction activity comply with Section § 19.80.100 of the Municipal Code, which limits construction activity to hours during the less sensitive daytime hours. These requirements will assure that short-term ground-borne vibration impacts will be less than significant. Long-term operation of the project is not expected to generate ground-borne vibrations or noise. Impacts will be less than significant.

- c) No Impact.** The Project site is located approximately 11 miles west of the Palm Twentynine Palms Airport and outside of existing and modeled future airport noise contours. Therefore, no impacts would occur, and no mitigation measures would be required.

Mitigation Measures: None.

Monitoring: None.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|------------------------------|-----------|
| XIV. POPULATION AND HOUSING – Would the project: | | | | |
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | | | X | |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | X |

Sources: U.S. Census Bureau, Southern California Association of Government, “Pre-Certified Local Housing Data for the City of Twentynine Palms”, (updated 2021); Southern California Association of Governments, “Current Context Demographics and Growth Forecast” (2020).

Environmental Setting

In 2023, Twentynine Palms was estimated to have a population size of approximately 28,734.¹¹ The household size is a mix of single- and multi-family homes. 32.2% of households consist of 2 people, and 25% of households consist of one person. The City has a total of 9,681 housing units, of which 8,749 units are occupied, equating to a 9.6% vacancy rate.¹² The City’s population size is expected to increase to approximately 33,300 by 2045.¹³

Discussion of Impacts

- a) **Less Than Significant Impact.** The construction of the Project would result in a resort in which 100 units, 25 employee housing units, and complementary amenities will be located on approximately 42 acres. The local population is expected to fulfill the Project’s employee needs. The Project will require roadway improvements along Lear Avenue and Sullivan Road, however these roadways are part of the City’s existing circulation system and planned buildout, and are not considered expansions of the existing circulation system. Therefore, no population growth will be generated as a result of the Project’s development. For this reason, less than significant impact will occur.

¹¹ U.S. Census Bureau, Twentynine Palms City, <https://www.census.gov/quickfacts/fact/table/twentyninepalms/>.

¹² Southern California Association of Government, Pre-Certified Local Housing Data for the City of Twentynine Palms, Updated April 2021.

¹³ Southern California Association of Government, Current Context Demographics and Growth Forecast, Sept. 2020.

- b) No Impact.** The site's existing condition is undeveloped and vacant. There are no homes or communities located on-site which would otherwise be displaced by the Project. Since no relocation is occurring, the construction of replacement housing is not required. Overall, the Project will not displace or relocate homes. No impacts will occur.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|------------------------------------|--------------|
| XV. PUBLIC SERVICES | | | | |
| 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: | | | | |
| Fire protection? | | | X | |
| Police protection? | | | X | |
| Schools? | | | X | |
| Parks? | | | X | |
| Other public facilities? | | | X | |

Sources: City of Twentynine Palms General Plan; Google Earth; Online Resources; Project materials.

Environmental Setting

Fire Protection

The San Bernardino County Fire Department (SBCoFD) is responsible for fire protection within the City. SBCoFD operates 67 fire stations in 24 cities and covers approximately 19,278 square miles in the County. SBCoFD has a staff of about 1,017 county firefighting personnel and 654 fire suppression personnel available during each 24-hour period. The nearest fire station is Station# 44 at 6560 Adobe Road, located 5.1 miles east of the Project site.

Police Protection

The San Bernardino County Sheriff's Department is responsible for law enforcement in the City. A local police station operates out of City Hall at 6135 Adobe Road. The main police station is located at 6527 White Feather Road in Joshua Tree, approximately 7.2 miles west of the Project site.

Schools

The City and the Project are located within the boundaries of the Morongo Unified School District (MUSD), which provides public school facilities to accommodate students. The MUSD currently operates eighteen schools within its district, which stretches beyond Twentynine Palms to Yucca Valley and Morongo Valley. The nearest MUSD school, Twentynine Palms High School, is located approximately 3.9 miles northeast of the Project site.

Parks

There are a total of four existing parks (i.e. Bucklin Park, Luckie Park, Knott's Sky Park, and Veteran's Park) in the City. Pioneer Park is planned, but not yet constructed. The City's other major recreational facilities include Theatre 29, the Senior Community Center, Parks and Recreation Community Services Building, and Parks and Recreation Administration Building.

Discussion of Impacts

Fire Protection

Less than Significant Impact. Although the addition of new structures has the potential to increase fire department calls, the Project is consistent with planned growth in the area, and will add single story structures similar in mass and scale to the residential development that would occur under the current Land Use and Zoning designation. In addition, the development plans for the Project will be reviewed by the Fire Department so that they meet Fire Code, and access and circulation requirements to assure that the Department can access all structures on-site. The Project will also generate transient occupancy and property taxes for the City, which will provide revenue to offset additional service costs. The proposed Project will comply with the California Fire Code and regulations of the County Fire Department to reduce fire protection impacts to less than significant levels.

Police Protection

Less than Significant Impact. The proposed Project could potentially increase the number of police service calls due to an increase in onsite hotel guests, employees, and visitors. Based on the type and intensity of the proposed uses, the Project would not require the construction of new or expanded police station facilities. Project site plans would be reviewed by the Police Department, and the Project will be required to meet standard safety requirements. The Project will also generate transient occupancy and property taxes for the City, which will provide revenue to offset additional service costs. Impacts associated with police protection are expected to be less than significant.

Schools:

Less than Significant Impact. The Project does not propose any separate residential uses and therefore would not directly generate additional demand for schools. On-site employee housing and is unlikely to generate new demand for schools, since employees would have single residency access, not family access. While the Project could generate a small number of jobs, these jobs are expected to be mostly filled by existing residents of the area, and thus would not generate significant additional demand on school resources. As required by State law, the Project will be required to pay school impact fees, which are specifically designed to mitigate the impacts to schools caused by new development. Impacts would be less than significant.

Parks/Other Public Facilities

Less than Significant Impact. The proposed hotel will not induce substantial population growth. Parks, libraries and other public services are not expected to experience a significant increase in demand as a result of the Project, and no resulting physical impacts are expected to occur to these facilities, because the Project will provide hotel rooms, not permanent housing, and hotel guests are not expected to use recreational facilities due to the on-site recreation provided at the Project. The proposed development would not warrant the construction of new or expanded facilities, and environmental impacts would be less than significant.

Mitigation Measures: None.

Monitoring: None.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|------------------------------|-----------|
| XVI. RECREATION -- | | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | | | X | |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | X | |

Sources: Google Earth; City of Twentynine Palms General Plan.

Environmental Setting

The City of Twentynine Palms has 175 acres of recreational facilities made up of parks, special use areas and passive use areas provided by different sources including the City of Twentynine Palms and the Morongo School District. The City also enjoys access to the Joshua Tree National Park and a number of hiking trails, including the Indian Cove Boy Scout Trail and Fortynine Palms Oasis. Parks in the project area include Knox Sky Park (3.4 miles east) and Bucklin Park (4.8 miles east).

Discussion of Impacts

a, b) Less than Significant Impact. The proposed Project will provide on-site recreational amenities to its guests, including swimming pool, outdoor movie screen, open space areas for outdoor activities, and lodges. New jobs created by the Project are expected to be filled by people already living in the area or future residents coming to the area as part of expected growth. The proposed Project does not propose to add significant new numbers of people that would require recreation facilities. Therefore, the Project would not 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.

Since the Project proposes on-site recreational facilities, and all potential impacts have been assessed in this ISMND and found to be less than significant with mitigation, the Project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Impacts would be less than significant.

Mitigation Measures: None.

Monitoring: None.

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

Source: Twentynine Palms General Plan (2012); Historical/Archaeological Resources Survey Report – Twentynine Palms Ofland Hospitality Glamping Resort Project, prepared by CRM TECH January 24, 2024.

Environmental Setting

The Mojave Desert, including the City of Twentynine Palms have been home to the Serrano and the Chemehuevi Native Americans for centuries. Today, most Serrano descendants are affiliated with the San Manuel and the Morongo Indian Reservations, while the Chemehuevi are divided among the Chemehuevi, the Colorado River, and the Morongo Reservations.

The City and surrounding areas contain significant cultural resources to the Native American people which are considered non-renewable resources because they provide important information about the past and are of high cultural value to the tribes.

Discussion of Impacts

a, b) Less than Significant with Mitigation. On September 29, 2023, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. CRM TECH also contacted the nearby Twentynine Palms Band of Mission Indians and the Morongo Band of Mission Indians by electronic mail for additional information on potential Native American cultural resources in the project vicinity and to coordinate with the Twentynine Palms Band on Native American participation in the upcoming archaeological field survey.

The NAHC responded to CRM TECH in a letter dated November 21, 2023, stating that the Sacred Lands File identified no Native American cultural resources in the project vicinity. Noting that the absence of specific information would not

necessarily establish the absence of such resources, however, the NAHC recommended that local Native American groups be consulted for further information and provided a referral list of 27 individuals associated with 14 local Native American groups.

The Twentynine Palms Band of Mission Indians and the Morongo Band of Mission Indians offered no comments in response to CRM TECH, and tribal monitors were not available to participate in CRM TECH's field surveys.

The City completed Tribal Consultation in conformance with AB 52 requirements. The consultation resulted in the request for a Tribal monitor during site disturbing activities, consistent with Mitigation Measures CUL-1 and CUL-2, above. With implementation of these measures, impacts to Tribal cultural resources will be reduced to less than significant levels.

Mitigation Measures: See Section V. Cultural Resources

Monitoring: See Section V. Cultural Resources

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|------------------------------------|--------------|
| XVIII. TRANSPORTATION/TRAFFIC -- Would the project: | | | | |
| a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | | X | | |
| b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | | | X | |
| c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | X | |
| d) Result in inadequate emergency access? | | | | X |

Sources: City of Twentynine Palms General Plan; Google Earth; Technical Advisory on Evaluating Transportation Impacts in CEQA, State of California Governor's Office of Planning and Research, December 2018; Traffic Study Policy, City Council adoption February 22, 2005; San Bernardino County Transit Authority City VMT Guidance Checklist, 2021; Yonder 29 Palms Traffic Analysis, prepared by Urban Crossroads, April 20, 2024; Yonder 29 Palms Vehicles Miles Traveled (VMT) Screening Evaluation, prepared by Urban Crossroads, November 7, 2023.

Environmental Setting

The primary east-west corridors in the Project vicinity is the SR-62/Twentynine Palms Highway, classified as an Expressway and located immediately north of the site's boundary. The north-south access to the Project is Lear Avenue, classified as a Collector¹⁴, and located immediately west of the site.

The Project is located on the southeast corner of Lear Avenue and SR-62. Currently, potential access points from Lear Avenue and Sullivan Road are unpaved, dirt roads. In addition to the development of the hotel, the Project is proposing the construction and improvement of Lear Avenue, in accordance with Collector standards to functions as a connection between SR-62 and Sullivan Road. Sullivan Road will also be paved to service the site as a two-lane roadway with a Local roadway classification from Lear Avenue to the employee housing access drive.

The General Plan requires that traffic flow on new streets be maintained at level of service (LOS) C or better according to Implementation Policy CI-1.1. The City's VMT Policy establishes that there is no standard for LOS on existing streets. Caltrans strives to maintain LOS D on State highways, including SR-62.

Urban Crossroad prepared a Traffic Impact Analysis (Appendix H) and Vehicle Miles Traveled Screening Evaluation (Appendix I) for the proposed Project. The analyses have been prepared in accordance with the City of Twentynine Palms Traffic Study Policy

¹⁴ Twentynine Palms General Plan "Circulation Element", Exhibit CI-1, 2012.

(2021), Planning Commission Resolution No. 20-07, and the adoption of SB743, Vehicle Miles Traveled Policy Guidance Staff Report. In addition, the Project's trip-generation is derived from the Institute of Transportation Engineers (ITE) Trip Generation 11th Edition.

From the report, the Project is expected to generate a total of 894 trip-ends per day. The land-use designations used to describe the site were Glamping Units and Food and Beverage. The level of service (LOS) analysis study area evaluated 5 intersections as shown in Table 9.

| Table 9 | |
|--|---------------------------------------|
| Intersection Analysis Locations | |
| ID | Intersection |
| 1 | Lear Av./Twentynine Palms Hwy |
| 2 | Monte Vista Av./ Twentynine Palms Hwy |
| 3 | Lear Av./ Cactus Av. |
| 4 | Lear Av./ Sullivan Rd. |
| 5 | Lear Av./N. Project Access |

Discussion of Impacts

a) Less Than Significant Impact with Mitigation.

On-Site Improvements

The following recommendations are provided in the Traffic Analysis and based on the minimum improvements needed to based on City standards to accommodate site access and maintain acceptable peak hour operations for the proposed Project (Mitigation Measure TRA-1).

Lear Avenue & North Project Access (#5)

- Install a stop control on the westbound approach.
- Provide a westbound shared left-right turn lane.

Lear Avenue & Sullivan Road / South Project Access (#4)

- Install a stop control on the southbound approach.
- Provide a westbound shared through-right turn lane.

In addition, the Project is to construct the following site-adjacent roadways:

- Construct Lear Avenue along the site's westerly edge to its ultimate half-section plus 10 feet of pavement west of the centerline as a Collector between Twentynine Palms Highway (SR-62) and Sullivan Road.
- Construct Sullivan Road along the site's southerly edge to its ultimate half-section plus 10 feet of pavement south of the centerline as a Local Street between Lear Avenue and the South Project Access.

On-site traffic signing and striping should be implemented consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the Project site.

Sight distance at each project access point should be reviewed with respect to standard Caltrans and City of Twentynine Palms sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

Existing (2023) Traffic Conditions in the Project's Vicinity

The Project site is currently undeveloped and vacant. No traffic is being generated from the site. The intersections within the Project's vicinity are operating within the City's LOS C minimum requirement. Table 10 identifies LOS for current intersection operations, and includes future intersections proposed by the Project.

| Table 10 Existing (2023) Intersection Conditions | | | | | |
|--|-----------------|---------------------|------------------|---------------|-----|
| Study Intersections | Traffic Control | AM Peak Hours | | PM Peak Hours | |
| | | Delays ² | LOS ³ | Delay | LOS |
| 1 Lear Av./Twentynine Palms Hwy | TS | 18.6 | B | 18.4 | B |
| 2 Monte Vista Av./ Twentynine Palms Hwy | CSS | 17.5 | C | 19.9 | C |
| 3 Lear Av./ Cactus Dr. | | Future Intersection | | | |
| 4 Lear Av./Sullivan Rd. | | Future Intersection | | | |
| 5 Lear Av./N. Project Access | | Future Intersection | | | |
| Source: Table 3-1: Intersection Analysis for Existing (2023) Conditions, prepared by Urban Crossroads, April 2024. TS= Traffic Signals; CSS= Cross-street Stops ² Per the Highway Capacity Manual (6 th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersection with cross street stop control, the delay and level of service for the worst individual movement (or movement sharing a single lane) are shown ³ LOS= Level of Service | | | | | |

Project Trip Generation

The Project proposes the development of a resort in which 100 units, 25 employee housing units, and complementary amenities including a food and beverage space, main and secondary lodges for special events and communal gathering, an outdoor movie screen, and a stargazing area will be provided within a 152-acres parcel. The Project is anticipated to generate 894 external vehicle trip-ends per day with 54 external AM peak vehicle hours trips and 62 external PM peak hours vehicle trips, based on the hotel units and assuming that the food and beverage facilities would be open to the public.

Traffic Analysis

The cumulative traffic analyses are based on the following traffic conditions:

- Existing 2023
- Ambient growth (4.04%)
- Cumulative Development Traffic
- Project traffic

The traffic controls assumed to be in place for Existing Plus Project conditions are shown in the Table below. There are no study area intersections that are anticipated to operate at a deficient LOS for Existing Plus Project traffic conditions.

| Table 11 | | | | | |
|--|-----------------|---------------------|------------------|---------------|-----|
| Existing Plus Project Intersection Conditions | | | | | |
| Study Intersections | Traffic Control | AM Peak Hours | | PM Peak Hours | |
| | | Delays ² | LOS ³ | Delay | LOS |
| 1 Lear Av./Twentynine Palms Hwy | TS | 18.7 | B | 18.5 | B |
| 2 Monte Vista Av./ Twentynine Palms Hwy | CSS | 18.1 | C | 21.9 | C |
| 3 Lear Av./Cactus Dr. | CSS | 8.6 | A | 8.6 | A |
| 4 Lear Av./Sullivan Rd. | CSS | 8.5 | A | 8.5 | A |
| 5 Lear Av./ N. Project Access | CSS | 8.4 | A | 8.5 | A |
| Source: Table 5-1: Intersection Analysis for Existing Plus Project Conditions, prepared by Urban Crossroads, April 2024. TS= Traffic Signals; CSS= Cross-street Stops ² Per the Highway Capacity Manual (6 th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersection with cross street stop control, the delay and level of service for the worst individual movement (or movement sharing a single lane) are shown ³ LOS= Level of Service | | | | | |

The study also studied Cumulative (2025) traffic in conjunction with the addition of Project traffic. This scenario includes Existing traffic volumes plus an ambient growth factor of 4.04% plus traffic from pending and approved but not yet constructed known development projects in the area. The analysis assumes that Project roadway improvements are constructed, including a shared left/through lane at Lear Avenue and Cactus Avenue. As shown in Table 12, the study area intersections are anticipated to operate at an acceptable LOS under Cumulative (2025) Plus Project traffic conditions.

| Table 12 | | | | | |
|---|-----------------|---------------------|------------------|---------------|-----|
| Cumulative (2025) Plus Project Traffic Conditions | | | | | |
| Study Intersections | Traffic Control | AM Peak Hours | | PM Peak Hours | |
| | | Delays ² | LOS ³ | Delay | LOS |
| 1 Lear Av./Twentynine Palms Hwy | TS | 19.0 | B | 19.2 | B |
| 2 Monte Vista Av./ Twentynine Palms Hwy | CSS | 21.6 | C | 26.4 | D |
| 3 Lear Av./Cactus Dr. | CSS | 8.6 | A | 8.6 | A |
| 4 Lear Av./Sullivan Rd. | CSS | 8.5 | A | 8.5 | A |
| 5 Lear Av./ N. Project Access | CSS | 8.4 | A | 8.5 | A |
| Source: Table 6-2: Intersection Analysis for Cumulative (2025) Plus Project Conditions, prepared by Urban Crossroads, April 2024. TS= Traffic Signals; CSS= Cross-street Stops ² Per the Highway Capacity Manual (6 th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersection with cross street stop control, the delay and level of service for the worst individual movement (or movement sharing a single lane) are shown ³ LOS= Level of Service | | | | | |

The tables above indicate that with the proposed roadway improvements, Project area intersections will operate at acceptable levels. Impacts associated with maintaining consistency with applicable policies will therefore be less than significant.

To analyze the impacts of the Project GPA on the City's street system, an analysis of conditions in 2045 (anticipated General Plan build out) was conducted. The analysis found that the GPA would result in an increase in traffic of 423 trips per day (Table 7-1 of Appendix H). The analysis first considered the 2045 conditions without the Project, and found acceptable conditions, with improvements consistent with General Plan build out standards. Specifically, the addition of southbound left and right turn lanes on Lear Avenue north of SR-62, as shown in the Table below.

| Table 13 2045 Without Project Traffic Conditions | | | | | |
|---|-----------------|---------------------|------------------|---------------|-----|
| Study Intersections | Traffic Control | AM Peak Hours | | PM Peak Hours | |
| | | Delays ² | LOS ³ | Delay | LOS |
| 1 Lear Av./Twentynine Palms Hwy | | | | | |
| Without Improvements | TS | 32.8 | D | >80 | F |
| With Improvements | TS | 28.7 | C | 37.3 | D |
| 2 Monte Vista Av./ Twentynine Palms Hwy | CSS | 33.6 | C | 32.7 | D |
| 3 Lear Av./Cactus Dr. | CSS | 8.6 | A | 8.7 | A |
| 4 Lear Av./Sullivan Rd. | CSS | 8.6 | A | 8.7 | A |
| 5 Lear Av./ N. Project Access | CSS | 8.5 | A | 8.5 | A |
| Source: Table 7-2: Intersection Analysis for 2045 Without Project Conditions, prepared by Urban Crossroads, April 2024. TS= Traffic Signals; CSS= Cross-street Stops ² Per the Highway Capacity Manual (6 th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersection with cross street stop control, the delay and level of service for the worst individual movement (or movement sharing a single lane) are shown ³ LOS= Level of Service | | | | | |

When the increase in traffic projected for the GPA is added to with Project conditions, and assuming the same improvements described above, LOS conditions remain acceptable at all studied intersections, as shown in Table 14. Therefore, the GPA will have less than significant impacts on traffic policy at build out of the General Plan.

| Table 14 2045 With Project Traffic Conditions | | | | | |
|--|-----------------|---------------------|------------------|---------------|-----|
| Study Intersections | Traffic Control | AM Peak Hours | | PM Peak Hours | |
| | | Delays ² | LOS ³ | Delay | LOS |
| 1 Lear Av./Twentynine Palms Hwy | | | | | |
| Without Improvements | TS | 33.6 | D | >80 | F |
| With Improvements | TS | 29.6 | C | 37.5 | D |
| 2 Monte Vista Av./ Twentynine Palms Hwy | CSS | 33.8 | C | 32.7 | D |
| 3 Lear Av./Cactus Dr. | CSS | 8.6 | A | 8.6 | A |
| 4 Lear Av./Sullivan Rd. | CSS | 8.5 | A | 8.5 | A |
| 5 Lear Av./ N. Project Access | CSS | 8.4 | A | 8.5 | A |

| Table 14 2045 With Project Traffic Conditions | | | | | |
|--|-----------------|---------------------|------------------|---------------|-----|
| Study Intersections | Traffic Control | AM Peak Hours | | PM Peak Hours | |
| | | Delays ² | LOS ³ | Delay | LOS |
| Source: Table 7-3: Intersection Analysis for 2045 With Project Conditions, prepared by Urban Crossroads, April 2024. TS= Traffic Signals; CSS= Cross-street Stops ² Per the Highway Capacity Manual (6 th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersection with cross street stop control, the delay and level of service for the worst individual movement (or movement sharing a single lane) are shown ³ LOS= Level of Service | | | | | |

Alternative Transportation Plan

The Morongo Basin Transit Agency (MBTA) provides public transit services to all of the Morongo Basin which encompasses Twentynine Palms. The MBTA operates four fixed bus routes throughout the City. The closest bus stop to the site is located on the southeast corner of Monte Vista Avenue and Twentynine Palms Hwy, approximately 0.12 miles to the west. A secondary bus stop near the site is located on the northeast corner of Indian Cove Road and Twentynine Palms Hwy, approximately 0.30 miles to the northwest.

The Project will not conflict with the City's adopted traffic policies. Transit service is reviewed and updated by MBTA periodically to address ridership, budget and community demand needs. Once operational, the Project is not expected to significantly degrade the accessibility to transit, roadways, bicycle lanes, or pedestrian facilities. With the recommended site and site adjacent improvements in place, the Project's development will result in less than significant impacts.

- b) Less Than Significant Impact.** CEQA Guidelines section 15064.3 sets forth guidelines for implementing Senate Bill 743 (SB 743) which promotes GHG emission reduction, the development of multimodal transportation networks, and diversity of land uses. Amendments to CEQA Guidelines includes the evaluation of a project's transportation impact based on vehicle miles traveled or VMT metric. VMT refers to the amount and distance of automobile travel related to a project. To comply with CEQA, the City of Twentynine Palms adopted analytical procedures, screening tools, and impact thresholds for VMT, which are documented in the City of Twentynine Palms Planning Commission Resolution No. 20-07 (August 2020).

Consistent with City Guidelines, projects should evaluate available screening criteria based on their location and project type to determine if a presumption of a less than significant transportation impact can be made. The Project Type Screening threshold, specifically local serving uses, was selected for review based on its applicability to the proposed Project. Local serving uses can include hotels and resorts that primarily serve visitors to nearby attractions. The introduction of new local-serving projects has been determined to reduce VMT by shortening trips that will occur.

The VMT analysis prepared for the Project (Appendix I) determined the Project met the Project type screening criteria because the Project offers lodging to visitors of nearby destinations, including the Joshua Tree National Park. Also, the on-site food and beverage uses support to the Project units and provide a new local service for adjacent residents to accommodate their food and beverage needs. The provision of on-site guest services and lodge facilities shortens non-discretionary trips by putting those goods and services closer to complimentary land uses, resulting in conditions which do not increase overall VMT. Therefore, the Project would not conflict with CEQA Guidelines section 15064.3. Impacts are less than significant.

- c) **Less Than Significant Impact.** The Project makes use of Twentynine Palms Hwy and Lear Avenue, both existing streets, to provide access to the site. The Project proposes the extension and improvement of Lear Avenue and Sullivan Road to provide the primary and secondary access points, respectively. The construction of these roadways will be in accordance with the City's General Plan Circulation Element and applicable standards imposed by the City through conditions of approval. The intersections of these roadways will be at 90 degree angles, and will not increase hazards or limit the line of sight at these locations. Similarly, the access at Sullivan Road will be designed to City standards, and will be required to preserve line of sight. Interior to the Project, the primary driveway is designed in a curvilinear fashion, and will final designs will be required to demonstrate that line of sight is preserved. Vehicle traffic will be limited to the parking lot and main lodge area, and pedestrian, bike or golf cart traffic will occur beyond that location, limiting the vehicular hazards within the Project site. Impacts associated with Project roadway hazards will be less than significant.
- d) **No Impact.** The Project proposes two access points, including the main entrance along Lear Avenue and secondary access along Sullivan Road. All driveways can serve as emergency access routes. Prior to construction, the Fire and Police Departments will review the site plan to ensure safety measures are addressed, including emergency access and vehicle turnaround space. Construction plans will be coordinated with the City and emergency providers, as needed, to assure that emergency access is maintained throughout all stages of development. No impact will occur.

Mitigation Measures:

- TRA-1:** Site Adjacent and Site Access Improvements
The Project shall adhere to the site adjacent and site access recommendations set forth in the Traffic Impact Analysis.

Lear Avenue & North Project Access (#5)

- Install a stop control on the westbound approach.
- Provide a westbound shared left-right turn lane.

Lear Avenue & Sullivan Road / South Project Access (#4)

- Install a stop control on the southbound approach.
- Provide a westbound shared through-right turn lane.

In addition, the Project is to construct the following site-adjacent roadways:

- Construct Lear Avenue along the site's westerly edge to its ultimate half-section plus 10 feet of pavement west of the centerline as a Collector between Twentynine Palms Highway (SR-62) and Sullivan Road.
- Construct Sullivan Road along the sites southerly edge to its ultimate half-section plus 10 feet of pavement south of the centerline as a Local Street between Lear Avenue and the South Project Access.

Monitoring:

TRANS.A All improvement plans for the proposed Project shall be prepared to include the roadway and access improvements cited in Mitigation Measure TRA-1.
Responsible Parties: Project applicant, City Engineer, Planning Department.

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

Source: Twentynine Palms General Plan; Twentynine Palms Water District 2020 Urban Water Management Plan, June 2021.

Environmental Setting

Domestic Water (please also see Hydrology and Water Resources)

The proposed Project is located within the Twentynine Palms Water District (TPWD) boundaries for domestic water services. The District's water supply source is 100 percent groundwater produced from District-owned and operated wells. The District provides water service to approximately 6,800 households in their water service area¹⁵.

Wastewater Treatment

The only Wastewater Treatment Plant (WWTP) in the region is located at the Marine Corps Air Ground Combat Center (MCAGCC). The City, including the Project area, does not have a sanitary sewer system and currently operates with septic tanks and project-specific sewage package plants. The Project proposes an on-site wastewater package plant.

¹⁵ Twentynine Palms Water District 2015 Urban Water Management Plan.

Flood Control/Drainages

The San Bernardino County Flood Control District (SBFCD) is responsible for managing regional drainage within and in the vicinity of Twentynine Palms. The City works with SBFCD to manage local drainages in the City, which are divided between well-defined drainage courses (some have been channelized) and areas of wide sheet flow. Development that may alter the direction of flow onsite are conditioned per standard City and County practices to maintain the existing site drainage patterns at inlets and outlets.

Solid Waste

Burrtec Waste Industries provides solid waste pick up and disposal, as well as recycling services in the City. Solid waste disposal and landfill siting is managed by the County of San Bernardino, Solid Waste Management Division. The Project will utilize commercial dumpsters for waste removal.

Other Utilities

The electrical energy to the City is provided by Southern California Edison (SCE). Natural gas service is provided to the City by Southern California Gas Company (SoCalGas). Telephone service is provided by a number of companies, including both land lines and cellular services.

Discussion of Impacts

a-c) Less Than Significant Impact.

Water

The Twentynine Palms Water District (TPWD) will provide water for the Project. The Project will connect to existing water infrastructure in Lear Avenue, and loop a water line through the Project development area. According to the 2020 Twentynine Palms UWMP, the Twentynine Palms Water District's (District) projected 2025 water demand is 2,660 AFY, and the projected 2045 water demand is 3,200 AFY (UWMP Table 2-8). The projected 2025 water production is 3,048 AFY, and the projected 2045 water production is 3,660 AFY (UWMP Table 2-9). The proposed Project's water demand (33.7 AFY) represents 1.3% of the projected 2025 water demand and 1.05% of the projected 2045 District water supplies. The Project's projected water demand is well within the District's projected water supply projections for 2025 and 2045.

Therefore, the Project will not substantially decrease local groundwater supplies. Buildings will be equipped with water efficient fixtures in compliance with Building Code requirements to reduce water consumption. The Project includes irrigation requirements, including the use of water-efficient fixtures and drought-tolerant landscape materials, which will help reduce water demand over the long term. Impacts will be less than significant.

Wastewater

Neither the City nor the Twentynine Palms Water District (TPWD) have a municipal sewer system. All development within the proposed Project will be connected to the package plant that will be constructed on-site. To estimate the amount of

wastewater generated by the Project, the City's Equivalent Dwelling Unit (EDU) wastewater generation rate of 175 gallons per day¹⁶ was applied to the hotel and employee housing.

An EDU for a hotel is 0.5 EDU per room, or 87.5 gallons per day per hotel room. The employee housing units are considered 1 EDU each. Per this calculation, 100 hotel units at 87.5 gallons per day, and 25 employee housing units at 175 gallons per day would generate a total of 13,125 gallons of wastewater per day (gpd). The package plant will be designed to treat all of the sewage on-site, and maintain the plant consistent with state law. The proposed treatment plant will be required to meet or exceed RWQCB waste discharge standards, and comply with all local, regional and state regulations relating to waste discharge. As a result of existing law and standard requirements, impacts associated with wastewater will be less than significant.

Stormwater Drainage

The Preliminary Drainage Study determined that the 100-year, 24-hour peak discharge values at the most downstream point for the off-site basin is 487 cfs (cubic feet per second), and runoff would impact the Project site along the southerly boundary of the property. The proposed Project will not discharge into either regional or local drainage systems. Rather, it will manage stormwater on-site. A final hydrologic analysis will be required to demonstrate that the Project meets the City's standards for on-site stormwater retention (please see Hydrology above). These standard requirements will assure that impacts associated with storm water retention remain less than significant.

Other Utilities

The proposed Project will require construction of on-site electric power, natural gas, and telecommunications infrastructure to connect to the existing infrastructure located in the Project vicinity. The Project would not result in the construction of new electric power, natural gas, or telecommunications facilities off-site that could cause significant environmental effects.

- d,e) Less Than Significant Impact.** Construction and operations-related solid waste from the Project will be collected and disposed by Burrtec, a regional commercial vendor that serves the City by hauling solid waste to transfer and recycling centers and landfills. Trash generated by the project will be hauled to the Twentynine Palms Transfer Station, east of the City, and then transported to Landers Landfill, a regional landfill located approximately 30 miles northwest of the City. Twentynine Palms Transfer Station has a permitted throughput of 1,200 tons per day. Landers Landfill had a remaining capacity of 13,983,500 cubic yards and is estimated to close in 2072.

¹⁶ City of Twentynine Palms Schedule of Fees, amended by City Council June 14, 2022. Sewer Fees.

| Table 15 | | | | |
|--|-----------------------------|-----------------|--|---|
| Estimated Solid Waste Disposal at the Project Buildout | | | | |
| Land Use | CIWMB Disposal Rates | Proposed | Solid Waste Disposal (pounds per day) | Solid Waste Disposal (tons per year) |
| Residential | 12.23 lbs./household/day | 25 units | 305.75 | 55.8 |
| Hotel/Motel | 2 pounds/dwelling unit/day | 100 rooms | 200 | 36.5 |
| TOTAL | | | | 92.3 |
| TOTAL (with 50% diversion) | | | | 46.15 |
| *Estimated Solid Waste Generation Rates by CalRecycle, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , Accessed December 2024. | | | | |

The Project will be required to comply with state law, which requires the reduction of solid waste streams by 50% through recycling of materials. The City and Burrtec will require that the Project provide recycling facilities on-site as part of the trash maintenance system. At buildout, the proposed Project will contribute less than 0.001% of the Landers landfill's remaining capacity. Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse.

Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. These requirements will assure that impacts associated with solid waste disposal remain less than significant.

Mitigation Measures: None required.

Monitoring: None required.

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

Sources: Twentynine Palms General Plan; Fire and Resources Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

Environmental Setting

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. A wildland-urban interface is an area where urban development is located in proximity to open space or “wildland” areas. The potential for wildland fires represents a hazard where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones.

The California Department of Forestry and Fire Protection (Cal Fire) has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps place areas of the state into different Fire Hazard Severity Zones (FHSZ) based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. The subject property is not located in or near a state responsibility area or designated as a Very High Fire Hazard Severity Zones (VHFHSZ).

According to the General Plan, the site is not located in a fire hazard zone (Exhibit SF-2). The site is not located adjacent to forested areas, and the site does not support significant vegetation.

Discussion of Impacts

- a) **Less than Significant Impact.** The subject property is not located in or near a state responsibility area or lands classified as a Very High Fire Hazard Severity Zone. The Project does not propose major long-term changes to circulation in the Project area other than providing direct access to the subject property. Project construction could result in temporary lane closures or detours, particularly as new driveway and intersection improvements are completed; however, potential disruptions to emergency access would be temporary and coordinated with and approved by the City through the preparation of a traffic management plan. The Project will not alter the physical orientation of the area and would not interfere with the City's emergency response or evacuation procedures in the event of a wildfire. The Project does not propose changes to existing emergency response facilities or personnel. Impacts are anticipated to be less than significant.
- b) **Less than Significant Impact.** The Project site is not located in or near a state responsibility area or lands classified as a Very High Fire Hazard Severity Zone, nor is it adjacent to these zones. The foothills of the Little San Bernardino Mountains are located 0.7 miles south of the site, and occupants of the Project may be exposed to pollutant concentrations from a wildfire in the mountains. However, the Little San Bernardino Mountains are characterized by rocky terrain and sparse vegetation, and wildfire risks have been historically very low. Impacts are expected to be less than significant.
- c) **Less than Significant Impact.** The Project site is not located within or near a state responsibility area or classified as a Very High Wildfire Hazard Severity Zone. The Project would not require the installation or maintenance of wildfire infrastructure that could exacerbate fire risks or result in adverse environmental impacts. Impacts related to infrastructure are expected to be less than significant.
- d) **Less than Significant Impact.** The Project site has very low potential for landslide and post-fire slope instability given its generally flat terrain. The Project site is located in flood Zone X, an area determined to be outside the 0.2% annual chance floodplain on the Flood Insurance Rate Map (FIRM) by the Federal Emergency Management Agency (FEMA) (Map No. 06071C8175H). Therefore, the proposed Project is not expected to expose people or structures to significant risks such as downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes. Impacts are expected to be less than significant.

Mitigation Measures: None required.

Monitoring: None required.

| | Potentially Significant Impact | Less Than Significant w/ Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|------------------------------|-----------|
| XXI MANDATORY FINDINGS OF SIGNIFICANCE -- | | | | |
| 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? | | X | | |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | | X | | |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | | X | |

Discussion of Impacts

a) Less than Significant Impact with Mitigation.

Biological Resources

No special status species were detected during the field survey; however, there is the potential for five plant and six wildlife special status species including invertebrates, reptiles, mammals, and birds to occur within the Project's area. To ensure impacts to special status species are reduced to the greatest extent, the Project will be required to implement Mitigation Measure BIO-1 through BIO-5 to protect the desert tortoise, migratory birds, burrowing owl, American badger and pallid San Diego pocket mouse. Additionally, the Project will be required to adhere to any applicable City ordinance regarding the conservation of biological resources and species. In accordance with these standards and mitigation measures, the Project's development is not expected to pose a significant threat to the native and migratory species occupying the wildlife corridor. As such, less than significant impacts are anticipated.

Cultural Resources

The Project is located on a culturally sensitive site, therefore mitigation measures CUL-1 and CUL-2 are provided to require the protection of two “Environmentally Sensitive Areas” which are located outside the development boundary during construction and to require archaeological monitoring during earth-moving operations associated with the project. Mitigation measures provided in this document will ensure that impacts to cultural and/or tribal resources are less than significant.

Overall, there will be no significant environmental impacts to biological and cultural resources which cannot be mitigated. Project related impacts are considered less than significant.

- b) **Less than Significant Impact with Mitigation.** A significant impact could occur if the proposed Project, in conjunction with related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. Here, however, the impacts of the proposed Project are individually limited and not cumulatively considerable. Although the Project proposes a GPA, DCA and REZ from Single-Family Residential Estate to Tourist Commercial and Open Space Conservation, the development intensity and deep setbacks of the proposed hotel and employee housing are consistent with the scattered residential uses in the Project area, and would not substantially increase density in the area. All environmental impacts that could occur as a result of the proposed Project would be less than significant with the implementation of mitigation measures included herein, and when viewed in conjunction with other closely related past, present or reasonably foreseeable future projects, would not be significant.
- c) **Less than Significant Impact.** The Project would not pose environmental effects that would cause direct or indirect substantial adverse effects on human beings. The Project will be developed in accordance with applicable requirements set forth in the Twentynine Palms Municipal Code, in addition to federal, state, and regional requirements, and the mitigation measures defined in this document reduce any potential environmental impacts to less than significant levels.

APPENDICES

APPENDIX A: CalEEMod Outputs

APPENDIX B: Biological Resources Assessment Report

APPENDIX C: Jurisdictional Delineation

APPENDIX D: Historical/Archaeological Report

APPENDIX E: Geotechnical Report

APPENDIX F: Preliminary Drainage Report

APPENDIX G: Noise Study

APPENDIX H: Traffic Report

APPENDIX I: VMT Screening

Available on the City of Twentynine Palms Website:

www.ci.twentynine-palms.ca.us