INITIAL STUDY

FOR THE

PHELAN PIÑON HILLS COMMUNITY SERVICES DISTRICT WELL No. 18 PROJECT

Prepared for:

Phelan Piñon Hills Community Services District
4176 Warbler Road
Phelan, California 92371

Prepared by:

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LIST OF ABBREVIATIONS AND ACROYNMS

°F	Fahrenheit
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AF	acre feet
AF	Acre Feet
AFY	acre feet per year
AKA	also known as
amsl	above mean sea level
APE	Area of Potential Effect
APN	Assessor's Parcel Number
APN	Assessor's Parcel Number
AQGGA	Air Quality and Greenhouse Gas Assessment
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	Air Resources Board
AVAA	Antelope Valley Adjudication Area
BACMs	Best Available Control Measures
bgs	belowground surface
BMPs	Best Management Practices
BRA	Biological Resources Assessment
C&D	construction and demolition

C_2Cl_4	perchloroethylene
C_2H_4O	acetaldehyde
C_4H_6	1,3-butadiene
C_6H_6	benzene
CAA	Clean Air Act
CAAA	Clean Air Act Amendment
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCAR	California Climate Action Registry
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CH_2O	formaldehyde
CH_4	methane
CHRIS	California Historical Resources Information System
Chromium-6	hexavalent chromium
CIP	Capital Improvement Projects
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	carbon dioxide
COA	Conditions of Approval
COCs	constituents of concern
Corps	U.S. Army Corps of Engineers
Corps	United States Army Corps of Engineers
Cr(VI)	hexavalent chromium
CRHR	California Register of Historical Resources
CRMP	Cultural Resource Management Plan
CWA	Clean Water Act
CY	cubic yard
dB	decibel
dBA	A-weighted decibel

DDW	Division of Drinking Water
DPM	diesel particulate matter
DTSC	Department of Toxic Substance Control
DWR	Department of Water Resources
EIR	Environmental Impact Report
EO	Executive Orders
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FGC	Fish & Game Code
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Maps
FT	Federal Threatened
FTA	Federal Transit Association
GCC	Global Climate Change
GHG	Greenhouse Gas
gpm	gallons per minute
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
HCP	Habitat Conservation Plan
HFCs	hydrofluorocarbons
hP	horse power
HSC	Health and Safety Code
IEPR	Integrated Energy Policy Report
in/sec	inches per second
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
km	kilometers
kWh	kilowatt hour
lbs./day	Pounds Per Day
Leq	equivalent continuous sound level
LF	lineal feet
LRA	Local Responsibility Area
LSA	Lake or Streambed Alteration
LST	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCL	maximum contamination level
MCL	maximum contaminant level
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District

MLD	Most Likely Descendant
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MT	Metric Ton
$MTCO_2e/yr$	Metric Tons of CO_2 equivalent per year
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NBP	Nesting Bird Plan
No.	Number
NO2 or NOx	Nitrogen Dioxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resource Conservation Service
NWI	National Wetlands Indicator
NWI	National Wetlands Inventory
O3	Ozone
Pb	Lead
PFCs	perfluorocarbons
PH/RL	Phelan/Pinon Hills/Rural Living
PH/RS-1	Phelan/Pinon Hills/Single Residential -1 Acre Minimum
PM 10	Fine Particulate Matter
PM 2.5	Fine Particulate Matter
PPHCSD	Phelan Piñon Hills Community Services District
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resource Code
R	Refrigerants
RL	Rural Living
ROG	reactive organic gases
ROW	Rights-of-Way
RPS	Renewable Portfolio Standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Lahonton Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act

SGMP	Sustainable Groundwater Management Plan
SO2	Sulfur Dioxide
SOI	Secretary of Interior
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resources
TEA-21	Transportation Equity Act for the 21st Century
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VdB	vibration-velocity decibel
VLDR	Very Low Density Residential
VMT	vehicle miles traveled
VOCs	Volatile Organic Compounds
vph	vehicles per hour
WOTUS	Waters of the United States
WQMP	Water Quality Management Plan
YSMN	Yuhaaviatam of San Manuel Nation

PROJECT INFORMATION

Project Title	Phelan Piñon Hills Community Services District Well No. 18 Development Project
Lead Agency Name	Phelan Piñon Hills Community Services District
Address	4176 Warbler Road, Phelan, California 92371
Contact Person	Sean Wright, Water Operations Manager
Phone Number	760-868-1212 ext. 314
Email	swright@pphcsd.org

Project Location

The project is located at two locations within the Phelan Piñon Hills Community in the High Desert region of San Bernardino County shown on **Figure 1**, a regional aerial location map.

Well 18 (**Figure 2**)
Latitude/Longitude: 34.508512°, -117.591181°
The project is located along Beekley Road south of Begonia Road and north of Palmdale Road in the community of Phelan, within Unincorporated San Bernardino County. Well 18, its associate appurtenances and pipeline would be installed at this site, and pipeline would be installed within Beekley Road from the project site north to Begonia Road. The project site is located within Section 22, Township 5 North, Range 7 West of the USGS 7.5 Minute Shadow Mountain SE, CA topographical quadrangle.

Backup Well (**Figure 3**)
Latitude/Longitude: 34.512332°, -117.567860°
The project is located at northeast corner of Barker Road and Camellia Road in the community of Phelan, within Unincorporated San Bernardino County at APN 310138125. The Backup Well, its associate appurtenances and pipeline would be installed at this site, and pipeline would be installed within Camellia Road from the project site west to Sheep Creek Road. The project site is located within Section 24, Township 5 North, Range 7 West of the USGS 7.5 Minute Shadow Mountain SE, CA topographical quadrangle.

Project Sponsor Name	Phelan Piñon Hills Community Services District	
Address	4176 Warbler Road, Phelan, California 92371	
Land Use Designation	Well 18 Site	Rural Living (RL)
	Backup Well Site	Very Low Density Residential (VLDR)
Zoning Classification	Well 18 Site	Phelan/Pinon Hills/Rural Living (PH/RL)
	Backup Well Site	Phelan/Pinon Hills/Single Residential -1 Acre Minimum (PH/RS-1)

Project Description

Introduction

The Phelan Piñon Hills Community Services District (District or PPHCSD), formed as an independent District by voters in 2008, is located in the High Desert area of San Bernardino County between the Los Angeles/San Bernardino County Line and Victorville. The District provides the following community services: water distribution, solid waste and recycling collection, parks, and street lighting. The District operates under Domestic Well Supply Permit No. 05-13-21-PA-006 issued in June 2021, and as System No. 361020. Users within the District are largely single family residences on large parcels. A majority of the water produced in the District is for residential customers due to the limited industrial and commercial development within the District service area. The water distribution system of the District consists of 16 groundwater wells, 32 reservoirs, 31 active pressure reducing stations, 25 booster stations, approximately 338 miles of water lines, and three emergency interties.

Local groundwater supply makes up 100 percent of the District's current water supply portfolio, though the District owns three emergency interties that would allow the District to exchange water during shortage or emergency, thus enabling the use of imported water. The District owns 16 production wells in two groundwater adjudicated areas: the Mojave Basin Area (MBA) and the Antelope Valley Adjudication Area (AVAA). Three of the wells are not connected to the District's distribution system and are not used to supply the service area.

The proposed project is a Capital Improvement Projects (CIP) that would result in the construction of a new well under its hexavalent chromium (Chromium-6) maximum contaminant level (MCL) mitigation in anticipation of upcoming California Department of Public Health (CDPH) recommendations and State Water Resources Control Board adoption. Staff anticipates the State to approve a new MCL for Chromium-6 in the near-term future. As such, the District is proposing the construction of one new well, and analysis of two potential locations for said well, henceforth referred to as Well 18 and Backup Well sites, to meet the above circumstances.

Environmental Setting

The proposed project is located at the southwestern edge of the Mojave Desert, where it transitions to the San Gabriel Mountain foothills overlooking the Victor Valley. The Mojave Desert is characterized by broad alluvial fans, dissected terraces, playas, and scattered mountains. The general region is seismically active and subject to potential significant regional seismic events. Runoff from the San Gabriel Mountains is the primary source of surface stream flows. The project area has a shallow slope from south to north. The low annual humidity, moderate temperature swings, very low rainfall and frequent breezy conditions are typical of California's "Upper Desert" subclimate. Most years do not see temperatures drop below about 20°F or above about 105°F. Overall air quality is fair to poor. Both of the sites within which the District has selected for Well 18 and the Backup Well are currently vacant, containing native and non-native vegetation consistent with the high desert. The pipelines would be installed belowground within graded dirt and paved roadways.

Project Description

The District seeks to install a new well at one of the two proposed locations as part of their CIP, which would both aid the District in meeting current and future demand, and minimize Chromium-6 concentrations in the District's water supply. Well No. 18 is proposed to be located on 2.2-acre parcel (Assessor's Parcel Number [APN] at APN 3100-561-14) in the northern portion of the District, along Beekley Road, south of Begonia Road and north of Highway 18 (refer to the site plan provided as **Figure 4**). A backup location for Well 18 (Backup Well site) is proposed to be located on a 2.2-acre parcel (Assessor's Parcel Number [APN] at APN 3101-381-25) in the northern portion of the District, at the northeast corner of Barker Road and Camellia Road, east of Sheep Creek Road and North of Highway 18. This Initial Study analyzes the impacts of installing one well, but analyzes the site constraints associated with developing the well at the Well 18 or Backup Well site. At each of the well locations, pipeline would need to be installed to connect the new water supply to the District's existing supply system. The Well 18 site would require installation of about 600 lineal feet (LF) of water pipeline from the project site north along Beekley Road to an existing District water distribution pipeline at Begonia Road. The Backup Well site would require installation of about 1,800 lineal feet (LF) of water pipeline from the project site west along Camellia Road to an existing District water distribution pipeline at Sheep Creek Road. The pipeline, at either site, is anticipated to be 12" diameter in size. The site would include the following features: a 4" drain line to the retention basin; a 10' x 10' chlorination building adjacent to the proposed well; and, a 4" conduit, switch gear, and transformer to connect to the existing powerline pole.

Construction Scenario

Construction is anticipated to begin Summer of 2025 and conclude by Winter of 2025/2026.

Below outlines a more detailed sequence of events that will be implemented in support of the proposed the development of the proposed well.

- The bucket auger drill rig will come onsite and drill and install conductor casing and cement sanitary seal.
- The reverse rotary drill rig will mobilize to the site and set up, including sound walls.
- Drill the pilot borehole and collect associated data, such as lithology, geophysical logs, and isolated aquifer zone testing.
- Deliver the well construction materials.
- Borehole to target depth.
- Construct the well.
- Conduct initial well development by airlift, swab, and pump.
- Demobilize the drill rig and mobilize the test pump.
- Conduct final development by pumping to waste.
- Conduct pumping tests, sampling.
- Temporarily cap the well and demobilize remaining equipment.
- Return the site to original condition.
- Connect well to PPHCSD's potable Distribution System.
- Construct well discharge appurtenances: electric, etc.
- Construct necessary electrical infrastructure.

It is anticipated that about five persons will be at the well site at any one time to support drilling the well: three drillers, the hydrologist inspector, and a foreman. Daily trips to complete the well will average about 15 roundtrips per day, which on a given day may include: two roundtrips for drill rigs; between 6 and 12 roundtrips for cement trucks; a few trips to deliver pipe; and about 10-15 trips per day for employees. It is estimated that it will require about 6-10 weeks to drill the well, with 24-hour drilling activities for 7 days a week (surrounding housing to be notified in advance). The objective for the well is to generate a minimum 300 gpm. Assuming the groundwater quality is potable (see the discussion under Hydrology and Water Quality), the new well will be connected to the District's distribution system. The installation of appurtenances associated with the well installation, in addition to finishing the site, is anticipated to require about 60-75 construction days.

For either the Well 18 or Backup Well site, the closest connection to the District's system is, at most, 600 to 1,800 LF from the proposed well development site. The pipeline would be installed mostly within unpaved roadways, which are common throughout the District's service area; note that the portion of the alignment that connects to the District's existing distribution system in Sheep Creek Road is paved. The new well will be outfitted with a vertical turbine pump that will be located above ground and placed in a shaded structure designed to attenuate noise.

It is assumed that an underground utility installation team can install approximately 200 to 400 lineal feet (LF) of water distribution pipeline per day. A team consists of the following:

200-400 feet of pipeline installed per day
1 Excavator
1 Backhoe
1 Water truck
1 Dump Truck
Traffic Control Signage and Devices
1 Dump/Delivery trucks
Employees (6 members per team)

The emissions calculations are based upon the above assumptions for each pipeline installation team It is assumed that installation of about 1,800 LF of water distribution pipeline will occur over a period of up to 25 construction days. The final activity associated with the pipeline installation is repaving or recompaction of roads disturbed by the construction. Note paving will occur as quickly as possible when large enough areas are completed.

Ground disturbance emissions assume roughly 0.2 acre of land would be actively excavated on a given day. It is anticipated that installation of pipeline in developed locations will require the use of a backhoe, crane, compactor, roller/vibrator, pavement cutter, grinder, haul truck and two dump trucks operating 6 hours per day; a water truck and excavator operating 4 hours per day and a paving machine and compacter operating 2 hours per day. Installation of pipeline in undeveloped locations would require the same equipment as developed area without the paving equipment (cutter, grinder, paving machine). The contractor may occasionally use a portable generator and welder for equipment repairs or incidental uses.

Operational Scenario

Operation of the new well would not require any new employees as the well will be monitored and controlled remotely. The new production well would require up to 1.5 million KWH to operate per year (if full time). It is not anticipated that a back-up generator will be installed, though the District currently utilizes portable back-up generators when needed to ensure that its wells have continuous electricity. Chemicals used in the water production process will be chlorine for disinfection, sodium hypochlorite 12.5%

Surrounding land uses and setting:

The proposed project, as stated above under "Environmental Setting," is located in the Phelan area of San Bernardino County, which is located in the high desert just north of the San Gabriel Mountains. Both the Well 18 and Backup Well sites are vacant. Both sites are currently undisturbed containing native and non-native vegetation characteristic of the high desert.

Table 1: Existing Land Use and Land Use Designation: Well No. 18

Location	Existing Land Use	Land Use Designation
Project Site	Vacant site containing native vegetation characteristic of the High Desert	Very Low Density Residential
North	Vacant sites containing native vegetation characteristic of the High Desert	Very Low Density Residential
South	Various Residences	Very Low Density Residential
East	Vacant sites containing native vegetation characteristic of the High Desert	Very Low Density Residential
West	Vacant sites containing native vegetation characteristic of the High Desert	Very Low Density Residential

Table 2: Existing Land Use and Land Use Zoning Districts: Backup Well

Location	Existing Land Use	Land Use
Project Site	Vacant site containing native vegetation characteristic of the High Desert	Rural Living
North	Vacant site containing native vegetation characteristic of the High Desert	Rural Living
South	Vacant sites containing native vegetation characteristic of the High Desert	Rural Living
East	Vacant site containing native vegetation characteristic of the High Desert	Rural Living
West	Vacant sites containing native vegetation characteristic of the High Desert	Rural Living

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

There are several other agencies with possible jurisdiction/responsibility over the proposed project.

- First among these is the California State Water Resources Control Board Division of Drinking Water (State Board). The State Board ultimately approves connection of new well to the District's water distribution system after determining that the water quality is acceptable to supply potable water to District's customers. The existing District water supply permit will be modified to include the new well.
- A Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) for a NPDES general construction stormwater discharge permit will not be required because the project area of disturbance will be less than one acre. Standard construction best management practices (BMPs) will be necessary to control stormwater runoff and erosion.
- The U.S. Fish and Wildlife Service (USFWS) and/or CDFW may need to be consulted regarding threatened and endangered species documented to occur within the project area. Where such species are discovered in the Biological Resources Assessment, the appropriate consultation efforts will be required.
- If the Backup Well is selected, the District will likely be required to obtain the following regulatory approvals prior to impacts occurring within the identified jurisdictional areas: Corps Approved Jurisdictional Determination/Waiver; Regional Board CWA Section Report of Waste Discharge; and CDFW Section 1602 Streambed Alteration Agreement (SAA).

Assembly Bill 52 Consultation

Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?[1]

PPHCSD has been contacted by two Tribes under Assembly Bill (AB) 52: the Yuhaaviatam of San Manuel Nation (YSMN), and the Morongo Band of Mission Indians. The tribes were contacted to initiate the AB-52 process on January 31, 2025 to notify the tribes of the proposed project through mailed letters. During the 30-day consultation period, no response was received from the Morongo Band of Mission Indians; however, the Yuhaaviatam of San Manuel Nation (YSMN) has requested consultation on the project through the implementation of mitigation intended to address and avoid sensitive tribal cultural resources.

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

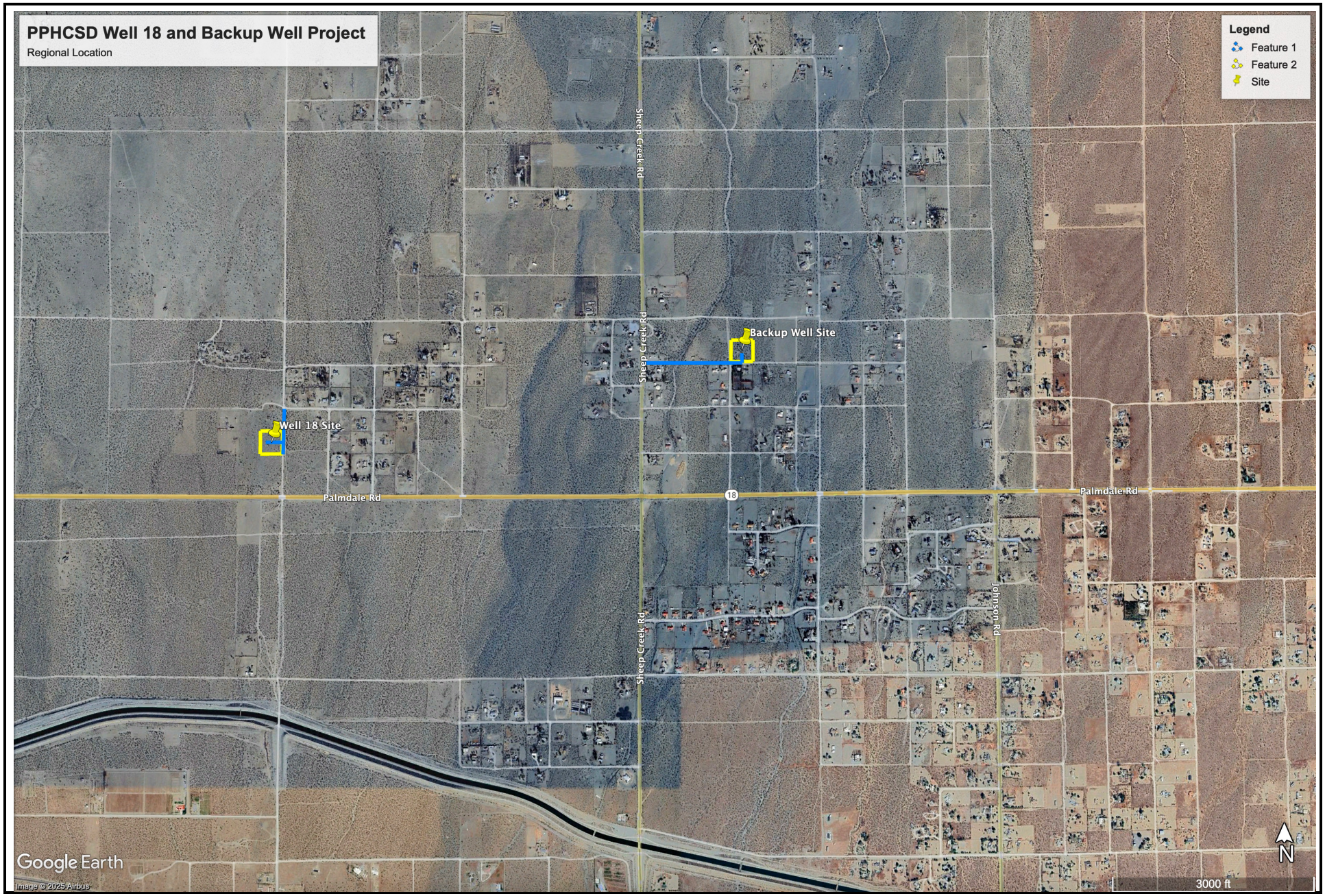

FIGURE 1

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Regional Map

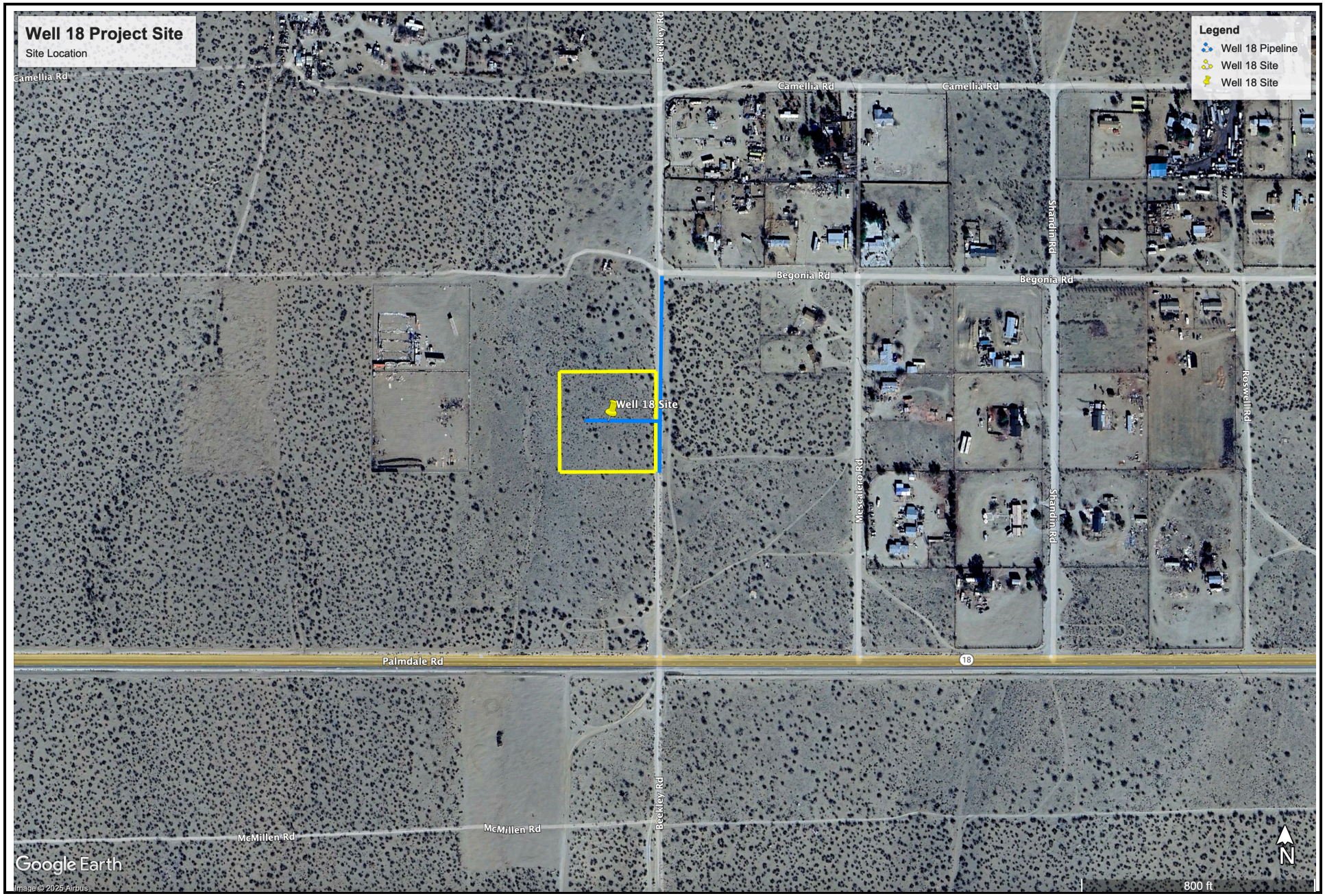

FIGURE 2

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Well 18 Site

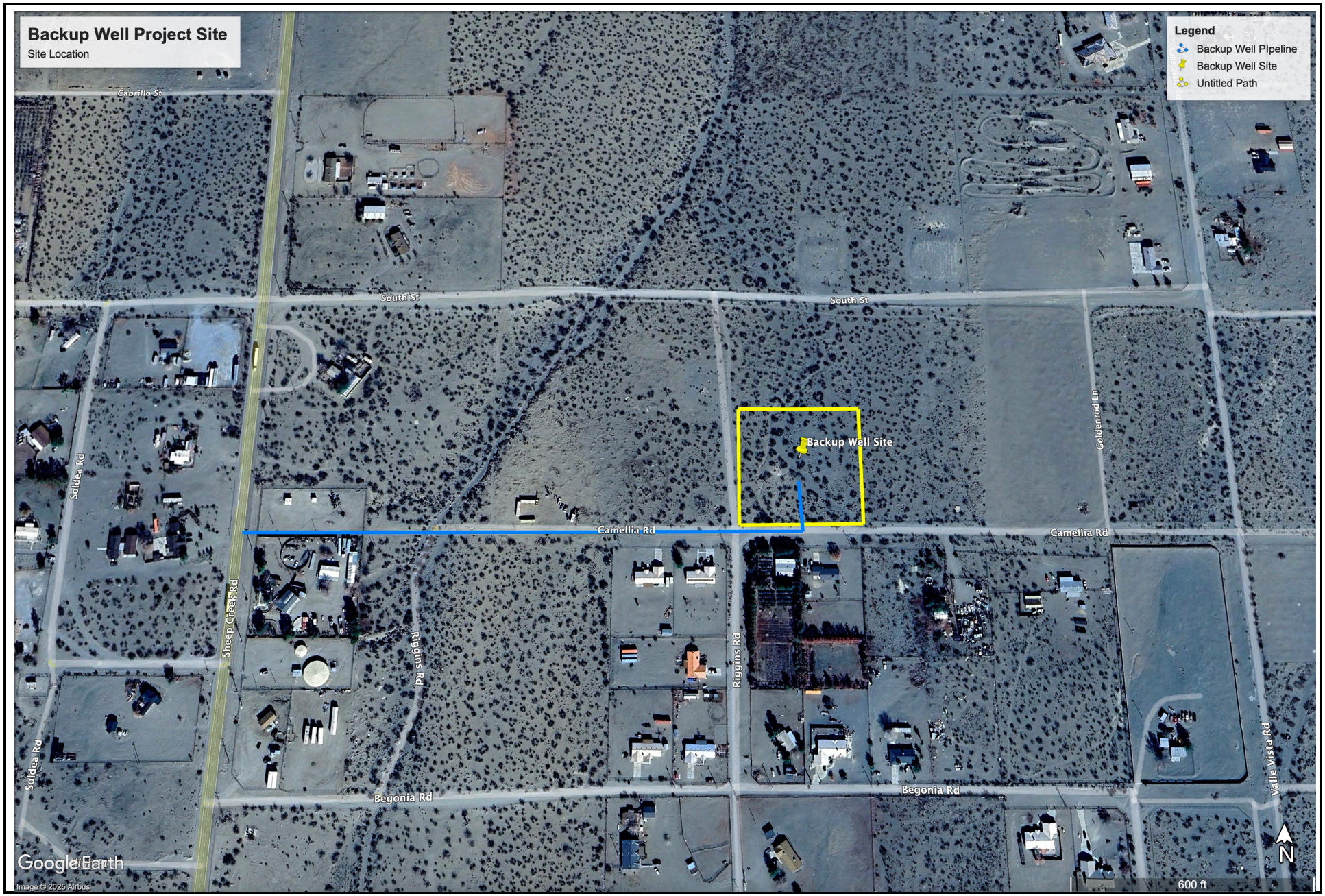

FIGURE 3

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Backup Well Site

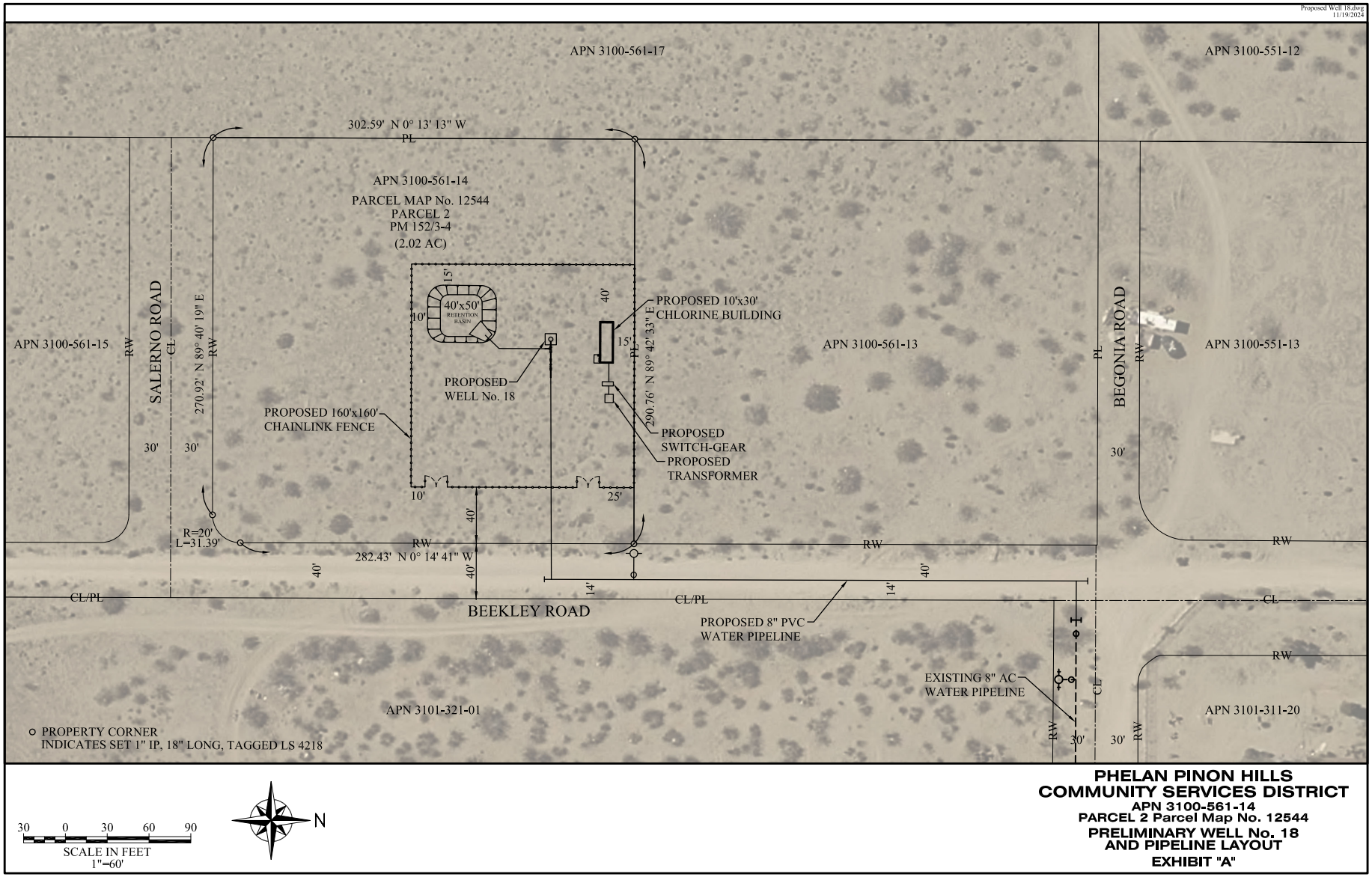

FIGURE 4

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Project Site Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

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

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

Tom Dodson & Associates
Prepared by

Date

Lead Agency (signature)

May 8, 2025
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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

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

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

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

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously

prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

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

9) The explanation of each issue should identify:

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

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

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. The proposed project would develop a well at one of two locations within the community of Phelan. Both the Well 18 and Backup Well site would be located within currently vacant sites. The Well 18 site currently is undisturbed containing native and non-native vegetation characteristic of the high desert, while the Backup well site contains similar vegetation (refer to **Figures 1-3**). Neither site contains features that would be considered scenic vistas. A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. The County of San Bernardino generally desires to preserve the unique environmental features and natural resources of the Desert Region, including native wildlife, vegetation, water and scenic vistas. There are no specific scenic vistas outlined in the newly adopted San Bernardino Countywide Plan that apply to the proposed project. The project sites are located in areas that contain views of the San Gabriel Mountains to the south that are somewhat limited by slope and existing development. The well, once developed and tested, would be placed under a small shaded structure with corrugated metal on the sides which would be designed to conform to the surrounding setting, which would be enforced through the following mitigation measure:

AES-1 ***The proposed structures shall be painted in colors that closely match the surrounding desert landscape, so as to create continuity in the potentially obscured views.***

Furthermore, given the limited development and the large size of the sites in which the well would be located, it is not anticipated that the small structure would impede any views that may be located within the vicinity of the project. The well head would be placed under a small shaded structure with corrugated metal on the sides with a height that is of similar height to the surrounding residential structures—though views in all directions from the project sites consist of vacant land as well as rural residential development in the foreground and middle ground view. Construction activities would be temporary and localized. Operational activities and the new enclosure would cause minor changes in views from surrounding development, but would not obstruct scenic vistas and therefore the impact as such is considered less than significant. Additionally, the associated pipeline connections would be located below ground, thus the impact to any scenic vistas would be less than significant. No further mitigation is required.

b. *Less Than Significant Impact* – The project sites are located in the rural community of Phelan; no scenic highways are located in the vicinity of the proposed project (refer to **Figure I-1**). The sites within which the proposed well is planned to be located are generally flat, containing extensive native vegetation, including Joshua trees. The project does not anticipate the removal of any Joshua trees, as the site design would avoid impacting any such trees located within the project sites during either construction or operations. Therefore, the proposed project would not substantially damage scenic resources, including, trees. Furthermore, a review of the sites reveals that no historic buildings, rock outcroppings, or other important any scenic resources existing within the project footprint. As such, with no scenic resources within the project footprint, and no features with scenic qualities therein, the proposed project would have a less than significant potential to substantially damage scenic resources. No mitigation is required.

c. *Less Than Significant Impact* – The project area is considered to be non-urbanized, and the project sites are located in areas that are part of the rural landscape that makes up the majority of the District's service area. Much of the area surrounding either site consists of vacant land, with scattered rural residences. Both of the well sites have not been developed and contain native vegetation typical of the high desert region within the County of San Bernardino. Ultimately, the development of these well and connecting pipeline within a vacant site is not anticipated to substantially degrade the visual character of the sites or public views within the area. Given the small area of disturbance, that the pipeline will be installed underground, and the minimal height of the well enclosure proposed as part of this project, the project site that would impede many public views surrounding the sites, it is not anticipated that the development of enclosed well at either vacant site would substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts under this issue are considered less than significant. No mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – The proposed project would be located within one of two sites that have been designated for Rural Living (RL) or Very Low Density Residential (VLDR) use, with the whole of the area surrounding these sites and the proposed pipeline alignment also designated for RL or VLDR use. While much of the land adjacent to the project sites is vacant, there are scattered rural residences adjacent to the sites. Lighting at the well site would be installed as needed for safety. Thus, the proposed project has a potential to create a new source of substantial lighting or glare during construction that could adversely affect nighttime views at the adjacent residences, and residences can be considered a light sensitive land use. There would be a new permanent light source to support operations of the well for security purposes. Lighting would also be required during the 24-hour drilling phase of the well construction. This poses a potential to

result in a substantial change to the area surrounding the project site. To protect nearby residences from direct light and glare from new lighting, the following mitigation measures would be implemented:

AES-2 ***A facilities lighting plan shall be prepared and shall demonstrate that glare from construction operations and safety night lights that may create light and glare affecting adjacent occupied property are sufficiently shielded to prevent light and glare from spilling into occupied structures. This plan shall specifically verity that the lighting doesn't exceed 1.0 lumen at the nearest residence to any lighting site within the project footprint. This plan shall be implemented by the District to minimize light or glare intrusion onto adjacent properties.***

With implementation of the above measure potential light and glare can be controlled to a less than significant impact level

FIGURE I-1

Tom Dodson & Associates
Environmental Consultants

Scenic Highways Map

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

SUBSTANTIATION

Impact Analysis

a. *No Impact* – The proposed District well sites and associated pipeline alignments are located within a rural community. Neither the project sites nor the adjacent and surrounding properties are

designated for agricultural use; no agricultural activities exist in the project area, though some farmland of statewide importance exists within the regional project area. However, there is no potential for impact to any agricultural uses or values as a result of project implementation. According to the San Bernardino Countywide Plan Agricultural Resources Policy Map, no prime farmland, unique farmland, or farmland of statewide importance exists within the vicinity of the proposed project (**Figure II-1**). No adverse impact to any agricultural resources would occur from implementing the proposed project. No mitigation is required.

b. *No Impact* – There are no agricultural uses currently within either project site or on adjacent properties. The well sites are designated for RL and VLDR use with the zoning classification for each site being Phelan/Pinon Hills/Rural Living (PH/RL) and Phelan/Pinon Hills/Single Residential -1 Acre Minimum (PH/RS-1). Given that the zoning classifications and land use designation do not support agricultural use, no potential exists for a conflict between the proposed project and agricultural zoning or Williamson Act contracts within the project area. No mitigation is required.

c. *No Impact* – Please refer to issues II(a) and II(b) above. The proposed District well sites would be located within a rural community. Neither the project site nor the adjacent and surrounding properties support forest land or timberland uses or designations. No potential exists for a conflict between the proposed project and forest/timberland zoning. No mitigation is required.

d. *No Impact* – There are no forest lands within the project area, which is because the project area is a desert. No potential for loss of forest land would occur if the project is implemented. No mitigation is required.

e. *No Impact* – Because the project sites and surrounding area do not support either agricultural or forestry uses and, furthermore, because the project sites and environs are not designated for such uses, implementation of the proposed project would not cause or result in the conversion of Farmland or forest land to alternative use. No adverse impact would occur. No mitigation is required.

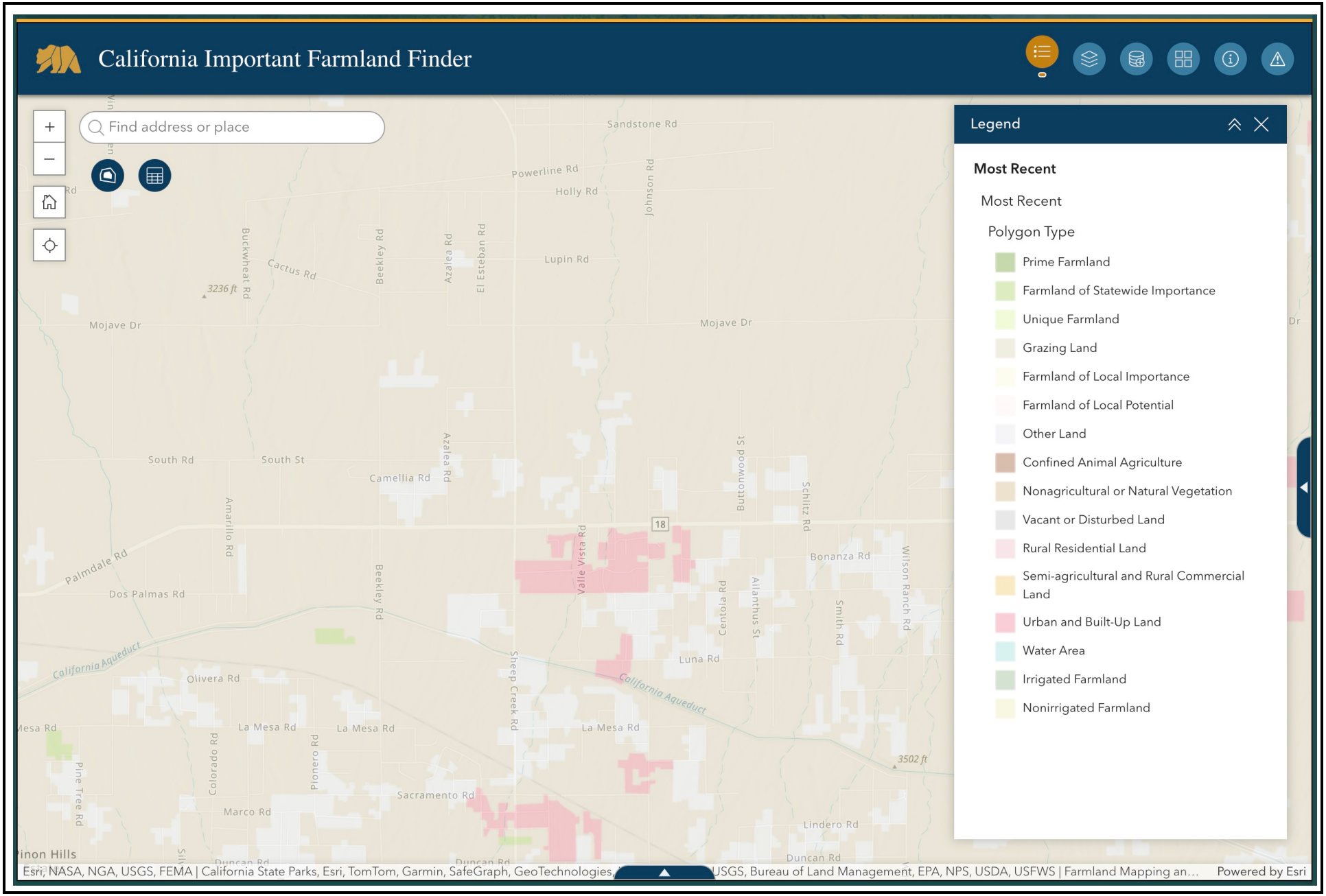

FIGURE II-1

Tom Dodson & Associates
Environmental Consultants

California Important Farm Finder Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Community Services District (CSD) Well No. 18 Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated March 26, 2025. This AQGGA is provided as **Appendix 1** to this Initial Study.

Background

The project site is located in the portion of the County of San Bernardino, California, that is part of the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The air quality assessment for the project evaluates emissions impacts associated with short-term construction and long-term operation of the project. A number of air quality modeling tools are available to assess the air quality impacts of projects. In addition, certain air districts, such as the MDAQMD, have created guidelines and requirements to conduct air quality analyses. The MDAQMD's current guidelines, included in its *California Environmental Quality Act and Federal Conformity Guidelines* (August 2016), were adhered to in the assessment of air quality impacts for the project.

Climate

Air quality in the project area is not only affected by various emissions sources (mobile, industry, etc.) but is also affected by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains within the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in Southern California by differential heating

are channeled through the MDAB. The MDAB is separated from the Southern California coastal and Central California valley regions by mountains (highest elevation is approximately 10,000 feet), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 feet). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 feet) between the San Bernardino and San Jacinto Mountains.

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

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

Applicable Regulatory Requirements

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

MDAQMD Rule 403

The purpose of this rule is to reduce the amount of PM_{10} entrained in the ambient air from anthropogenic fugitive dust sources within the MDAQMD by requiring actions to prevent, reduce, or mitigate fugitive dust. The following measures shall be incorporated into project plans and specifications as implementation of Rule 403.

- Use periodic watering for short-term stabilization of Disturbed Surface Area to minimize visible fugitive dust emissions. For purposes of this Rule, use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient to maintain compliance.
- Take actions sufficient to prevent project-related trackout onto paved surfaces.

MDAQMD Rule 1113

The purpose of this rule is to limit the quantity of volatile organic compounds (VOC) in architectural coatings. The following measures shall be incorporated into project plans and specifications as implementation of MDAQMD Rule 1113.

- Only "Low-VOC" paints consistent with MDAQMD Rule 1113 shall be used.

Methodology

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this project to determine construction and operational air quality and greenhouse gas emissions..

Air Quality Regional Emissions Thresholds

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

Table III-1: Maximum Daily Regional Emissions Thresholds

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

lbs/day = Pounds Per Day
ppm = Parts Per Million
µg/m3 = Micrograms Per Cubic Meter

Impact Analysis

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

Consistency Criterion No. 1

The project involves the installation of a new well at one of two proposed sites as part of the District's CIP. The project aims to address current and future water demand while reducing Chromium-6 concentrations in the water supply. Key components include a 6-inch drain line to a retention basin, a 10' x 10' chlorination building, a 5-inch conduit, switch gear, transformer, and a 20' x 10' building for housing switchgear and electrical panels. Additionally, the Well 18 site will require 600 LF of water pipeline, while the Backup Well site will need 1,800 LF. Although the County of San Bernardino

designates the Well 18 site as "Rural Living" and the Backup Well site as "Very Low Density Residential," creating a discrepancy between the proposed and designated land uses, the operations associated with the proposed project would not be more intensive than those that would occur if the site were developed according to the designated land uses. However, California Government Code Section 53091 specifies that water supply facilities such as those associated with the proposed project, are exempt from zoning restrictions. Furthermore, the project, as evaluated herein would not exceed the regional air quality significance thresholds.

On the basis of the preceding discussion, the project is determined to be consistent with the AQMP and a less than significant impact is expected

Consistency Criterion No. 2

All MDAQMD Rules and Regulations

The project would be required to comply with all applicable MDAQMD Rules and Regulations, including, but not limited to Rules 401 (Visible Emissions), 402 (Nuisance), 403 (Fugitive Dust), and 1113 (Architectural Coatings). As previously stated, the project would implement MDAQMD Rule 403 and MDAQMD Rule 1113.

Consistency Criterion No. 3

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

As substantiated herein, project construction and operational-source emissions would not exceed applicable MDAQMD significance thresholds. As such, the project would not have the potential to increase the frequency or severity of a violation in the federal or state ambient air quality for on-going project operations.

AQMP Consistency Conclusion

Although the project's proposed land uses are not consistent with the General Plan land use designations, the project would not exceed the applicable regional thresholds during construction or operations for emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ and would therefore be considered to have a less than significant impact. The project is therefore considered to be consistent with the AQMP. The project is therefore considered to be consistent with the AQMP and impacts under this issue are considered less than significant.

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

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

"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance

threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

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

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

Construction Activities

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

Vertical Construction
- Site Preparation
- Grading
- Building Construction
- Paving

Linear Construction
- Linear, Grubbing & Land Clearing
- Linear, Grading & Excavation
- Linear, Drainage, Utilities, & Sub-Grade
- Linear, Paving

Grading Activities

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

On Road Trips

Construction generates on-road vehicle emissions from vehicle usage for workers and vendors

commuting to and from the site. Worker and vendor trips are based on CalEEMod defaults.

Construction Duration

For purposes of analysis, construction of the project is expected to commence in August 2025 and would last through January 2026. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[2]. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*.

Construction Equipment

Equipment used for vertical and linear construction of the project at either site is shown in Table III-2.

Table III-2: Construction Equipment

Construction Activity	Equipment	Quantity	Hours
Vertical Construction			
Site Preparation	Graders Crawler Tractors	1 1	6 6
Grading	Graders	1	6
	Rubber Tired Dozers	1	6
	Crawler Tractors	1	6
Building Construction	Cranes	1	6
	Forklifts	1	6
	Tractors/Loaders/Backhoes	1	6
Paving	Tractors/Loaders/Backhoes	1	6
	Pavers	1	6
	Rollers	1	6
	Cement and Mortar Mixers	1	6
Linear Construction			
Linear, Grubbing & Land Clearing	Tractors/Loaders/Backhoes	1	6
	Dumpers/Tenders	1	6
	Excavators	1	4
	Other Construction Equipment	1	6
	Rollers	1	6
Linear, Grading & Excavation	Tractors/Loaders/Backhoes	1	6
	Dumpers/Tenders	1	6

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

Construction Activity	Equipment	Quantity	Hours
	Excavators	1	4
	Other Construction Equipment	1	6
	Rollers	1	6
Linear. Drainage, Utilities, & Sub-Grade	Tractors/Loaders/Backhoes	1	6
	Plate Compactors	1	2
	Dumpers/Tenders	1	6
	Excavators	1	4
	Paving Equipment	1	6
	Rollers	1	6
Linear, Paving	Tractors/Loaders/Backhoes	1	6
	Plate Compactors	1	2
	Dumpers/Tenders	1	6
Linear Construction			
Linear, Paving	Excavators	1	4
	Paving Equipment	1	6
	Paving Equipment	1	2
	Rollers	1	6

Regional Construction Emissions Summary

The estimated maximum daily construction emissions without mitigation are summarized in Tables III-3 and III-4. Under the assumed scenarios, emissions resulting from the project construction at either site would not exceed thresholds established by the MDAQMD for emissions of any criteria pollutant. Project construction-source emissions impacts would therefore be less-than-significant. Detailed construction model outputs are presented in Appendices 1 and 2 to the AQGGA.

Table III-3: Regional Construction Emissions Summary (Well 18)

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	$PM_{10}T$	$PM_{2.5}T$
Summer						
2025	1.62	14.02	15.42	0.02	6.64	3.31
Winter						
2025	0.42	4.13	4.56	0.01	0.17	0.16
2026	1.51	3.87	4.52	0.01	0.25	0.14
Maximum Daily Emissions	1.62	14.02	15.42	0.02	6.64	3.31
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Table III-4: Regional Construction Emissions Summary (Backup Well)

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	$PM_{10}T$	$PM_{2.5}T$
Summer						
2025	1.73	14.69	16.37	0.02	6.70	3.35
Winter						
2025	0.42	4.13	4.56	0.01	0.17	0.16
2026	1.51	3.87	4.52	0.01	0.25	0.14
Maximum Daily Emissions	1.73	14.69	16.37	0.02	6.70	3.35
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

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

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

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

AQ-2 *The following signage shall be erected no later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:*

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

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

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

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

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

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

Regional Operational Emissions

Long-term air quality emissions would typically occur from project-related traffic that could generate mobile sources and from stationary source emissions. The proposed project primarily involves construction activity. For on-going operations, mobile emissions would be generated by the motor vehicles traveling to and from the project sites during on-going maintenance. However, the project would generate a nominal number of traffic trips for periodic maintenance and inspections and would not result in any substantive new long-term daily emissions sources. As this project involves the operations of a well expected to extract a minimum of 300 gallons per minute, energy consumption is expected to require up to 1.5 million kWh annually. Water consumption associated with the project's land use is not anticipated, as the project will focus on extracting water rather than utilizing it.

The proposed project may include the use of an emergency diesel generator supplying power to the treatment plant in case of emergency. If a backup generator were installed, the lead agency would be required to obtain the applicable permits from MDAQMD for operation of such equipment. The MDAQMD is responsible for issuing permits for the operation of stationary sources to reduce air pollution, and to attain and maintain NAAQS and CAAQS within the MDAB. A backup generator would be used only in emergency situations and for routine testing and maintenance purposes. Based on information provided by the client, a 257 HP backup generator with a 0.80 load factor would operate for a maximum of 50 hours annually or approximately 1 hour per day. Emissions associated with the backup generator are summarized on Tables 7 and 8, as shown, emissions from the backup generator would not contribute a substantial amount of emissions capable of exceeding MDAQMD thresholds. As project operations would not exceed MDAQMD thresholds, the project would not violate an air quality standard or contribute to an existing violation. Detailed model outputs for the backup diesel generator emissions calculations are presented in Appendices 1 and 2 of the AQGGA.

Operational emissions associated with the well at either site are summarized in Tables III-5 and III-6.

Table III-5: Regional Operational Emissions Summary (Well 18)

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	$PM_{10}T$	$PM_{2.5}T$
Summer						
Stationary	0.46	1.29	1.18	0.00	0.07	0.07
Maximum Daily Emissions	0.46	1.29	1.18	0.00	0.07	0.07
MDAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Stationary	0.46	1.29	1.18	0.00	0.07	0.07
Maximum Daily Emissions	0.46	1.29	1.18	0.00	0.07	0.07
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Table III-6: Regional Operational Emissions Summary (Backup Well)

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	$PM_{10}T$	$PM_{2.5}T$
Summer						
Stationary	0.46	1.29	1.18	0.00	0.07	0.07
Maximum Daily Emissions	0.46	1.29	1.18	0.00	0.07	0.07
MDAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Stationary	0.46	1.29	1.18	0.00	0.07	0.07
Maximum Daily Emissions	0.46	1.29	1.18	0.00	0.07	0.07
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Project operational-source emissions would not exceed the numerical thresholds of significance established by the MDAQMD for any criteria pollutant, a less than significant impact would occur for project-related operational-source emissions and no mitigation is required.

Conclusion

With the incorporation of mitigation measures (**MMs**) **AQ-1** through **AQ-6**, the development of the project would have a less than significant potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c. *Less Than Significant Impact* – The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors.

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

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

The proposed project's land uses do not include the above uses. As such, no analysis for sensitive receptors is required. Additionally, results of the regional analysis indicate that the project will not exceed the MDAQMD significance thresholds during construction or operations. Therefore, sensitive receptors would not be subject to a significant air quality impact during project construction and operational activities.

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

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

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from a Biological Resources Assessment prepared by ELMT Consulting, titled "*Biological Resources Assessment for the Proposed Phelan Pinon Hills Community Services District Well No. 18 Development Project Located in the Phelan Pinon Hills Community, San Bernardino County, California,*" which is dated March 31, 2025. This assessment is provided as **Appendix 2** to this Initial Study.

General Setting

The proposed project sites are located in an area that supports a variety of land uses in the community of Phelan Piñon Hills. The project sites consist entirely of undeveloped, vacant land which support creosote scrub plant communities. Additionally, anthropogenic disturbances such as illegal dumping and off-road vehicular use, are heavily concentrated along the site boundaries.

The land surrounding the project sites is comprised of undeveloped, vacant land, and residential developments.

Vegetation

The project sites consist of vacant, undeveloped land that primarily support a creosote bush scrub plant community. In addition, the project sites support one (1) land cover type, that would be classified as disturbed (refer to **Figures IV-1 and IV-2**). Portions of the project sites have been subject to a variety of anthropogenic disturbances, including off-road vehicular use and illegal dumping. These disturbances occur primarily along the project boundaries, with relatively little disturbance occurring near the center of the project site. Refer to Attachment B of Appendix 2, *Site Photographs*, for representative site photographs.

The creosote bush scrub varies in density from unvegetated to moderately vegetated. Common plant species observed on-site include creosote (*Larrea tridentata*), Fourwing saltbush *(Atriplex canescens var. canescens*), rubber rabbitbrush (*Ericameria nauseosa*), Mediterranean mustard (*Hirschfeldia incana*), Russian thistle (*Salsola tragus*), flatspine bursage (*Ambrosia acanthicarpa*), horseweed (*Erigeron canadensis*), California buckwheat (*Eriogonum fasciculatum*), prostrate sandmat (*Euphorbia protstrata*), spineflower (*Chorizanthe* sp.). It should be noted that western Joshua tree (*Yucca brevifolia*) was observed in the 50-foot buffer of the Backup Well associated pipeline.

The disturbed land cover type is associated with the dirt roads along Beekley Road and Camilla Road where the proposed pipelines will be installed. These areas are devoid of vegetation.

Wildlife

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

Fish

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

Amphibians

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

Reptiles

The survey area provides limited foraging and cover habitat for local reptile species adapted to conditions within the Mojave Desert. No reptilian species were observed during the field investigation. Common reptilian species that could be expected to occur include Great Basin fence lizard (*Sceloporus occidentalis*

longipes), Great basin gopher snake (*Pituophis catenifer deserticola*), and red racer (*Coluber flagellum piceus*).

Birds

The project site and surrounding area provide suitable foraging and nesting habitat for bird species adapted to conditions within the Mojave Desert. Bird species detected during the field investigation include California horned lark (*Eremophila alpestris*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), song sparrow (*Melospiza melodia*), white-crowned sparrow (*Zonotrichia leucophrys*), and mourning dove (*Zenaida macroura*).

Mammals

The survey area provides moderate foraging and cover habitat for mammalian species adapted to conditions surrounding the Mojave Desert. Mammalian species detected during the field investigation include coyote (*Canis latrans*), California ground squirrel (*Otospermophilus beecheyi*), and white-tailed antelope squirrel (*Ammospermophilus leucurus*). Additional common mammalian species that could be expected to occur include desert cottontail (*Sylvilagus audubonii*).

Nesting Birds

No active nests or birds displaying nesting behavior were observed during the field survey, which was conducted outside the breeding season. The project site provides minimal nesting opportunities for year-round and seasonal avian residents, as well as migrating songbirds that are adapted to conditions surrounding the Mojave Desert.

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

Special-Status Plants

According to the California Natural Diversity Database (CNDDB) and California Native Plant Society's (CNPS), seven (7) special-status plant species have been recorded in the Shadow Mountain Southeast and Phelan quadrangles. No special-status plant species were observed within the proposed project sites. However, it should be noted that one (1) western Joshua tree was observed within 50 feet of the Backup Well site pipeline alignment. The majority of the project site consists of vacant, undeveloped land which supports a native creosote scrub community and is primarily surrounded by undeveloped, vacant and residential land. Based on the availability and quality of on-site habitats, habitat requirements for specific species, and general isolation of the site from nearby open spaces, it was determined that the project site does not have the potential to support any of the other special-status plant species known to occur in the area and all are presumed to be absent.

Western Joshua Tree

The California Fish and Game Commission (Commission) designated the western Joshua tree as a candidate for listing under the California Endangered Species Act (CESA) in October 2020. This action afforded the western Joshua tree the same CESA protections as listed species, which means that removal of the desert trees was subject to fines and criminal penalties unless authorized by a "take" permit issued

by the California Department of Fish and Wildlife (CDFW). Such permits were difficult to obtain, and when issued would authorize removal only in limited circumstances. The new law, which became effective July 1, 2023, streamlines the western Joshua Tree take permit process and broadens the purposes for which a permit may be issued. A western Joshua tree may now be removed for any purpose, so long as a permit is obtained and the removal is fully mitigated, or alternatively, an in-lieu mitigation fee is paid. The table below summarizes the new rules for the area in which the project site is located.

Location	Project Type	Requirements
Project is located within the standard fee area.	All project types.	Full mitigation, or in-lieu fee as follows: • $2,544.75 per tree > 5 meters tall • $509 per tree 1 to 5 meters tall • $346.00 per tree < 1 meter tall

One (1) size class B (1 to 5 meters tall) western Joshua tree was observed within the 50-foot buffer of the Backup Well associated pipeline during the field investigation. No western Joshua trees were observed within project boundaries.

Special-Status Wildlife

According to the CNDDB, fifteen (15) special-status wildlife species have been reported in the Shadow Mountain Southeast and Phelan quadrangles (refer to Attachment C of **Appendix 2**). No special-status wildlife species were observed or detected during the field investigation. The project site supports a creosote scrub community, which is capable of providing potential foraging and nesting/denning opportunities for wildlife species, especially those adapted to a high degree of anthropogenic disturbance. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed project site has a moderate potential to provide suitable habitat for Costa's hummingbird (*Calypte costae*) and loggerhead shrike (*Lanius ludovicianus*); and a low potential to support Crotch's bumble bee (*Bombus crotchii*).

Costa's hummingbird and Loggerhead shrike are not state or federally listed as threatened or endangered. In order to ensure impacts to Costa's hummingbird and loggerhead shrike do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance. With implementation of the pre-construction nesting bird clearance survey, impacts to special-status avian species will be less than significant and no mitigation will be required.

Due to regional significance, the potential occurrence of burrowing owl, desert tortoise, and Crotch's bumble bee are discussed in further detail below.

<u>Burrowing Owl</u>

The burrowing owl is currently listed as a Candidate endangered species under the CESA. It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground (Haug and Didiuk 1993; Dechant et al. 1999). Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting (Haug and Didiuk 1993). The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are

scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drain pipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

Despite a systematic search of the project site, no burrowing owls or sign (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The majority of the project site is vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by burrowing owl. However, no suitable mammal burrows or structures/pipes that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed within the boundaries of the site. Further, trees found onsite, and surrounding electrical poles north of the project site provide suitable perching opportunities for large raptors (i.e., red-tailed hawk) that can prey on burrowing owl.

Crotch's Bumblebee

The Crotch bumblebee is a candidate species for listing status by the CESA. It is a colonial species that lives almost exclusively from coastal California east towards the Sierra-Cascade Crest and can be found uncommonly in western Nevada and south through Baja California. The Crotch bumblebee inhabits grassland and scrub habitats in hotter and drier climates than most other bumblebee species and is only capable of tolerating a narrow range of climatic conditions. This species feeds on a variety of annual and perennial plant species, classifying it as a dietary generalist. It usually nests underground, often in abandoned rodent dens. Queens are active from March to May, with peak activity occurring in April; workers are active from April to August, with peak activity occurring between May and June; and males are active from May to September, with peak activity occurring in July.

A records search was conducted for Crotch's bumble bee occurrences within a 5-mile radius of the project site. The nearest occurrence, recorded in 2023, is located approximately 10 miles southeast of the site in the City of Hesperia. While the available native plant diversity supported by the creosote bush scrub plant community provides limited foraging habitat for Crotch bumblebee due to this species being a dietary generalist, the project sites provide minimal habitat for this species.

Generally, for all bumble bee species, high-quality habitat has three major components: a diverse supply of flowers for nectar and pollen, nesting locations, and subterranean spaces for overwintering queens (Hatfield et al. 2012). Based on the results of this assessment, the project site and immediately surrounding areas were determined to provide low plant diversity for nectar sources. Further, no bumble bees have been recorded in the immediate vicinity of the project site. Due to existing anthropogenic disturbances surrounding the project site, low plant diversity for nectar sources, and lack of recorded occurrences in the immediate vicinity of the project site Crotch bumble bee was determined to have a low potential to support Crotch bumblebee.

Desert Tortoise

The Mojave population of the desert tortoise inhabits areas north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Sonoran Desert in California. Throughout the majority of the Mojave Desert, desert tortoises occur most commonly on gentle sloping soils characterized by an even mix of sand and gravel and sparsely vegetated low-growing vegetation where there is abundant inter-shrub space. Typical habitat for the Mojave desert tortoise has been characterized as Mojavean desert scrub below 5,500 feet in elevation with a high diversity of

perennial and ephemeral plants. The dominant shrub commonly associated with desert tortoise habitat is creosote bush; however, other shrubs including burrobush (*Ambrosia dumosa*), Mojave yucca, cheesebush (*Ambrosia salsola*), and Mojave prickly pear (*Opuntia mojavensis*) also provide suitable habitat. The desert tortoise spends 95 percent of its life underground and will opportunistically utilize burrows of various lengths, deep caves, rock and caliche crevices, or overhangs for cover. Therefore, moderately friable soil is required to allow for burrow construction and ensure that burrows do not collapse.

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

Special-Status Habitats

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

The project site is not located within federally designated Critical Habitat. The nearest Critical Habitat designation is located approximately 11 miles to the southwest for mountain yellow-legged frog (*Rana muscosa*).

Jurisdictional Waters

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The United States Army Corps of Engineers (Corps) Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Water Quality Control Board (RWQCB or Regional Board) regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

The USFWS National Wetlands Indicator (NWI) and the United States Geologic Survey (USGS) National Hydrography Dataset were reviewed to determine if any blueline streams or riverine resources have been documented on the project site. Based on this review, no blueline streams or riverine resources have been identified on the project sites. However, according to the NWI, a riverine feature is mapped crossing the western portion of the pipeline alignment for the Backup Well site along Camellia Road.

The western portion of the Backup Well pipeline alignment crosses a blueline stream that flows from south to north. Additionally, during the field investigation a small drainage was observed on the Backup Well project site. This on-site drainage connects with the blueline stream approximately 440 feet to the northwest of the project site (outside of the project boundaries).

Both of these features are not relatively permanent, standing, or continuously flowing bodies of water and, therefore, will not qualify as waters of the United States under the regulatory authority of the Corps (*Sackett v. EPA* (2022) 143 S. Ct. 1322, 1336). However, these feature will likely fall under the regulatory authority of the Regional Board as waters of the State, and CDFW as jurisdictional streambed. If the Backup Well site is chosen, the project applicant will likely be required to obtain the following regulatory approvals prior to impacts occurring within the identified jurisdictional areas: Corps Approved Jurisdictional Determination/Waiver; Regional Board CWA Section Report of Waste Discharge; and CDFW Section 1602 Streambed Alteration Agreement (SAA).

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – It is not anticipated that the proposed project would result in a significant adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The project sites are vacant, though as stated above, anthropogenic disturbances such as illegal dumping and off-road vehicular use, are heavily concentrated along the site boundaries. The Biological Resources Assessment (BRA) provided as **Appendix 2** to this Initial Study determined that, of the seven (7) special-status plant species and fifteen (15) special-status wildlife species as having potential to occur within the Shadow Mountain Southeast and Phelan USGS 7.5-minute quadrangles. No special-status plant species were observed within the proposed project sites. However, it should be noted that one (1) western Joshua tree was observed within 50 feet of the Backup Well site pipeline alignment. Further, due to regional significance, the potential occurrence of burrowing owl, desert tortoise, and Crotch's bumble bee was further explored, and the BRA determined that the potential for desert tortoise and Crotch's bumble bee to occur on site was negligible such that no further actions are needed to ensure that these species are not impacted by the development of the proposed project. This is because, due to existing anthropogenic disturbances surrounding the project site, low plant diversity for nectar sources, and lack of recorded occurrences in the immediate vicinity of the project site Crotch bumble bee was determined to have a low potential to support Crotch bumblebee. Further, no live desert tortoises, suitable burrows, or other signs were observed during the field investigation. Additionally, the project site is isolated from known desert tortoise habitat by existing development, including roadways which support regular traffic. As a result, desert tortoises are presumed to be absent from the project site and focused surveys are not recommended. Based on the results of the field investigation, it was determined that the project site does not have potential to support burrowing owl (*Athene cunicularia*), and focused surveys are not recommended. However, out of an abundance of caution, a pre-construction burrowing owl clearance survey is recommended to be conducted prior to development to ensure burrowing owl remain absent from the project site that is selected by the District to move forward with Well 18 development.

As a result, the following mitigation measure that would require a preconstruction clearance survey for burrowing owl shall be implemented:

BIO-1 ***Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys shall be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW prior to commencing Project activities.***

Additionally, as stated above, should the District select the Backup Well site, a formal western Joshua tree census will be needed to catalog the trees. Further, an Incidental Take Permit will need to be prepared and processed with CDFW for potential indirect impacts to western Joshua tree. If implementation of the proposed project should result in impacts to, or removal of any of the western Joshua trees occurring onsite, payment for mitigation will be needed into the western Joshua tree mitigation fund. As a result, the following mitigation measure shall be implemented to ensure that the above actions are carried forth, thereby avoiding a potentially significant impact on western Joshua tree.

BIO-2 ***If the Backup Well site is selected, a formal western Joshua tree census shall be conducted to catalog the trees. Further, an Incidental Take Permit shall be prepared and processed with CDFW for potential indirect impacts to western Joshua tree. If implementation of the proposed project should result in impacts to, or removal of any of the western Joshua trees occurring onsite, payment for mitigation shall be made into the western Joshua tree mitigation fund.***

No other species have been identified as having a potential to exist within or be impacted by the proposed project. With implementation of the above mitigation, there is a less than significant potential for implementation of this project to have a significant adverse effect, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

b. *No Impact* – Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the USFWS regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a Clean Water Act Permit from the United States Army Corps of Engineers). If a there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The project site is not located within federally designated Critical Habitat. The nearest Critical Habitat designation is located approximately 11 miles to the southwest for mountain yellow-legged frog (*Rana muscosa*). Therefore, no impacts to federally designated Critical Habitat will occur from implementation of the proposed project. With no other riparian habitats or sensitive natural communities found in the project area, the proposed project would have no potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

c. *Less Than Significant With Mitigation Incorporated*– According to the data gathered by ELMT Consulting in **Appendix 2**, the western portion of the Backup Well pipeline alignment crosses a blueline stream that flows from south to north. Additionally, during the field investigation a small drainage was observed on the Backup Well project site. Both of these features are not relatively permanent, standing, or continuously flowing bodies of water and, therefore, will not qualify as waters of the United States under the regulatory authority of the Corps (Sackett v. EPA (2022) 143 S. Ct. 1322, 1336). However, these features will likely fall under the regulatory authority of the Regional Board as waters of the State, and CDFW as jurisdictional streambed. If the Backup Well site is chosen, the District will likely be required to obtain the following regulatory approvals prior to impacts occurring within the identified jurisdictional areas: Corps Approved Jurisdictional Determination/Waiver; Regional Board CWA Section Report of Waste Discharge; and CDFW Section 1602 Streambed Alteration Agreement (SAA).

BIO-3 ***If the Backup Well site is selected, the District shall minimize discharge of fill to the extent feasible, and any discharge of fill not avoidable shall be mitigated through compensatory mitigation. Mitigation can be provided by restoration of temporary impacts, enhancement of existing resources, or purchasing into any authorized mitigation bank or in-lieu fee program; by selecting a site of comparable acreage near the site and enhancing it with a native riparian habitat or invasive species removal in accordance with a habitat mitigation plan approved by regulatory agencies; or by acquiring sufficient compensating habitat to meet regulatory agency requirements. Impacts to jurisdictional waters shall be mitigated at a minimum 1:1 ratio, with the ultimate compensatory mitigation ratio being determined through negotiation with regulatory agency, and never at a rate of less than 1:1. The ratio will rise based on the type of habitat, habitat quality, and presence of sensitive or listed plants or animals in the affected area. This increase in ratio will be determined by the regulatory agency, and must be deemed sufficient by the regulatory agency issuing the permit to compensate for/offset the impacts to the jurisdictional waters and supported species and habitats therein. A Habitat Mitigation and Monitoring Proposal shall be prepared by a biologist or regulatory specialist and reviewed and approved by the appropriate regulatory agencies. These agencies (Corps, Regional Board, CDFW and any other applicable regulatory agency with jurisdiction over the proposed facility improvement) can impose greater mitigation requirements in their permits, but the District will utilize the ratios outlined above as the minimum required to offset or compensate for impacts to jurisdictional waters, riparian areas or other wetlands.***

There are no jurisdictional features that would require consultation with the Corps, Regional Board, or CDFW located within the Well 18 site, which is the preferred site for implementation of the

proposed project. With implementation of the above mitigation measure, there is a less than significant potential for implementation of this project to impact any federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

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

According to the San Bernardino Countywide Plan, the project site has not been identified as occurring within a Wildlife Corridor or Linkage. As designated by the San Bernardino Countywide Plan Open Space Element, major open space areas documented in the vicinity of the project site is approximately 7 miles south of the site. The site is separated from this identified regional wildlife corridors and linkages by existing development and roadways, and undeveloped land, and there are no riparian corridors or creeks connecting the project site to these areas.

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

Nesting birds are protected pursuant to the MBTA. A pre-construction clearance survey for nesting birds shall be conducted within three (3) days (72-hours) of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. A pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance.

BIO-4 ***Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be***

avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Thus, with implementation of **MM BIO-4** any effects on migratory birds, wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

e. *Less Than Significant Impact* – Certain desert plant species (i.e., smoke trees, cacti, Mojave yuccas [*Yucca schidigera*]) are regulated pursuant to Section 88.01.060 of the San Bernardino County Development Code and Section 80073 of the California Desert Native Plant Act. Therefore, impacts to these species should be avoided in all instances. In the event that avoidance is not feasible, the District shall obtain a Tree or Plant Removal Permit from the County of San Bernardino, prior to removal of any regulated tree or plant. However, it is anticipated that, due to the site design and absence of most protected species within the project area of potential effect (APE), the proposed project will avoid impacting desert plant species that require permit for removal from the County of San Bernardino. As the western Joshua tree near the Backup Well alignment is located outside of the APE, it is not expected that a Tree or Plant Removal Permit would be required to avoid impacts to this species. Thus, through compliance with the County of San Bernardino Development Code and Desert Plant removal permitting therein, the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. *No Impact* – Please refer to the discussion under response IV(a) above. The project has not been identified as being located within an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the project would therefore not result in a significant impact to any such plans. No further mitigation is necessary.

FIGURE IV-1

Tom Dodson & Associates
Environmental Consultants

Well 18 Vegetation Map

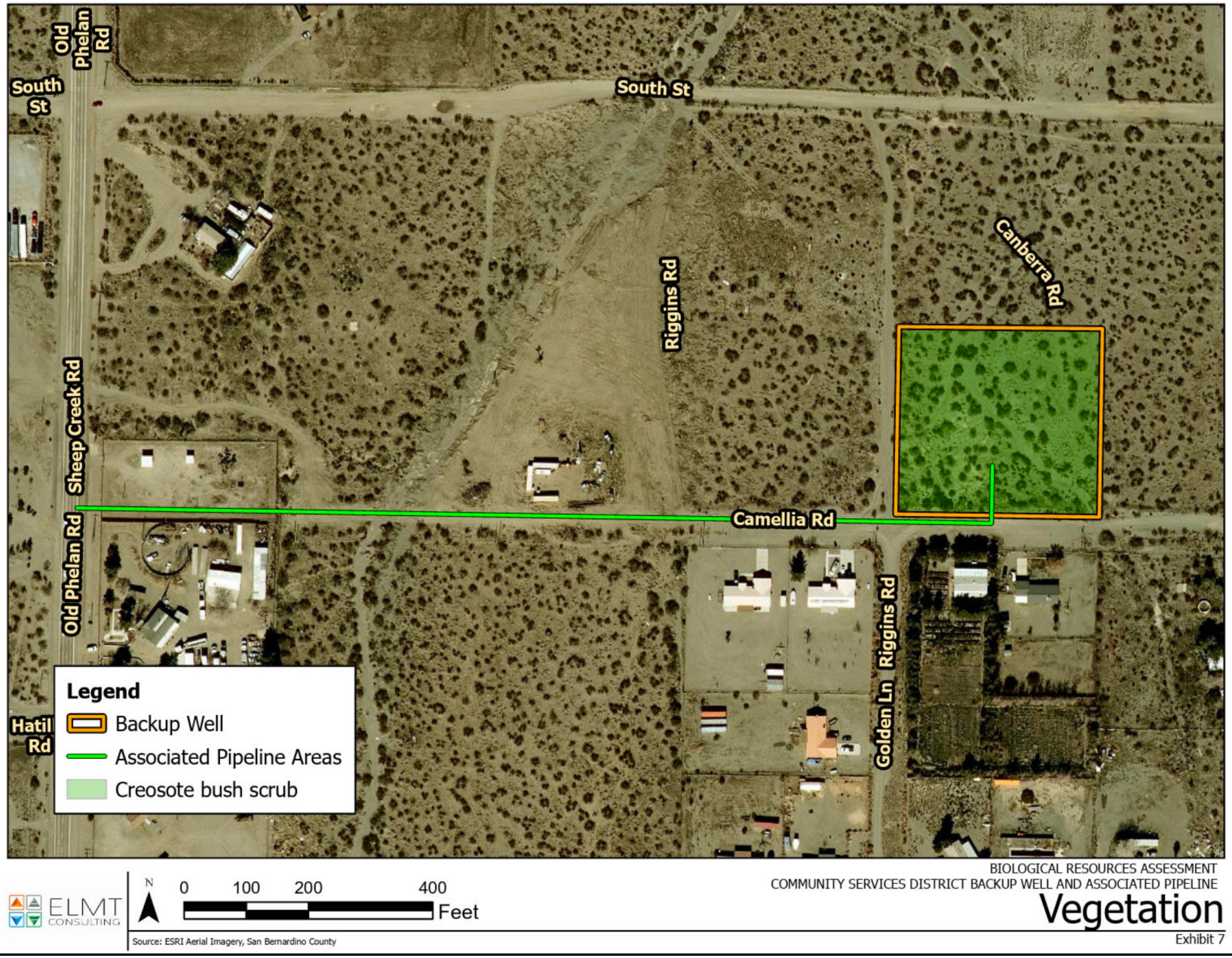

FIGURE IV-2

Tom Dodson & Associates
Environmental Consultants

Backup Well Vegetation Map

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

SUBSTANTIATION: The following information is provided based on the *Cultural Resources Assessment for the Phelan Piñon Hills Community Services District Well No. 18 Development Project in the Area of Phelan* prepared by Mojave Archaeological Consulting, dated March 20, 2025. This report is provided as **Appendix 3** to this Initial Study.

Background and Summary

The Cultural Resources Assessment (CRA) describes the methods and results of the cultural resources investigation of the project, including a records search, historic research, a Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), Native American outreach, and an archaeological survey. The purpose of the investigation was to provide PPHCSD with the information and analysis necessary to determine the potential for the proposed project to impact "historical resources" and "archaeological resources" under CEQA.

The records search completed at the South Central Coastal Information Center (SCCIC) included a 0.5-mile-wide buffer/study area, and indicated four previous cultural resource investigations have been conducted in the study area and nine historic cultural resources are previously documented within the area, none of which are in close proximity to the project or require any further consideration in relation to the proposed project activities. The SLF search with the NAHC was completed with negative results and further Native American outreach likewise did not indicate there are any known cultural resources within or adjacent to the project.

An intensive pedestrian survey of the project, conducted on February 20, 2025, identified scattered and fragmented wood building debris representing the remains of a 1950's recreational homestead cabin with no associated artifacts present. Such remains are ubiquitous throughout the desert area and are representative of numerous mid-century era small tract claims. Given the poor condition of the materials, lack of any associated artifacts or potential for buried refuse deposits, the minor remains do not meet any consideration for historic significance. As such, the field survey did not identify any resources that would be considered "historically significant" or a "historical resource" under CEQA.

In summary, the investigation concludes there are no "historical resources" known to be present within or adjacent to the project. Additionally, the geological context of the project setting and past disturbance suggests that any intact and significant buried archaeological deposits are unlikely to be present. Based

on these findings, Mojave Archaeological Consulting recommends to PPHCSD that the proposed project will have no impact on historical or archaeological resources. No further cultural resources work is recommended necessary for the proposed project activities. However, if any buried cultural materials are encountered during ground disturbance, all work should be halted in the vicinity of the discovery until a qualified archaeologist can assess the significance and integrity of the find. If intact and significant archaeological remains are encountered, impacts should be mitigated appropriately. Additionally, Health and Safety Code Section 7050.5, CEQA Statute & Guidelines Section 15064.5(e), and PRC Section 5097.98 mandate the process to be followed in the unlikely event of the discovery of human remains. Finally, if the project is expanded to include any areas not covered by this survey, or other recent cultural resource investigations, additional cultural resource survey would be required.

Impact Analysis

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

Per the above discussion and definition, no archaeological sites or isolates were recorded within the project boundaries; thus, none of them requires further consideration during this study. In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the project:

- No historical resources within or adjacent to the project area have any potential to be disturbed as they are not within the proposed area in which the facilities would be constructed and developed, and thus, the project as it is currently proposed would not cause a substantial adverse change to any known historical resources.
- No further cultural resources investigation is necessary for the proposed project unless construction plans undergo such changes as to include areas not covered by this study.

However, if any ground disturbing activities are required, the following mitigation measure would ensure that impacts to any buried cultural materials that may be discovered during earth moving activities is carried are less than significant:

CUL-1 ***Should any cultural resources be encountered during construction of the well and associated pipelines, any earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the District's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures to be implemented within the guidelines of the California Environmental Quality Act to reduce impacts to discovered resources to a less than significant level.***

Furthermore, as part of the AB 52 consultation process, the Yuhaaviatam of San Manuel Nation (YSMN) have requested that the following mitigation measures shall be implemented to minimize impacts to cultural resources:

CUL-2 ***In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within MM TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.***

CUL-3 ***If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within MM TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.***

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

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

CUL-4 ***If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.***

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

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

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – This project proposes the development of a new well. The well would be constructed with a 150-500 HP pump that would consume about 1.5 million kilowatt hours per year. Energy consumption encompasses many different activities. For example, construction can include the following activities: delivery of equipment and material to a site from some location (note it also requires energy to manufacture the equipment and material, such as harvesting, cutting and delivering wood from its source); employee trips to work, possibly offsite for lunch (or a visit by a catering truck), travel home, and occasionally leaving a site for an appointment or checking another job; use of equipment onsite (electric or fuel); and sometimes demolition and disposal of construction waste. For the proposed project the number of construction workers would be limited due to the small size of the project and site. Demolition, beyond the removal of small sections of concrete and asphalt to install the connecting pipeline, is not anticipated to be required for this project. To minimize energy costs of construction debris management, laws are in place that require diversion of all material subject to recycling. Energy consumption by equipment would be reduced by requiring shutdowns when equipment is not in use after five minutes and ensuring equipment is being operated within proper operating parameters (tune-ups) to minimize emissions and fuel consumption. These requirements are consistent with State and regional rules and regulations. Under the construction scenario outlined in the project description, the proposed project would not result in wasteful, inefficient, or unnecessary energy consumption during construction.

The proposed project would ultimately develop a new well that would pump water continuously to contribute to the District's existing potable water distribution center. No new employees are anticipated to be required in support of the project once the well is in operation. The project would be supplied power from Southern California Edison (SCE). Additionally, a backup generator would be installed at the site, which is anticipated to operate about 200 hours per year. Specifications are detailed in **Appendix 4**. A backup generator would be used only in emergency situations and for routine testing and maintenance purposes. Based on information provided by the client, a 257 HP backup generator with a 0.80 load factor would operate for a maximum of 50 hours annually or approximately 1 hour per day. Emissions associated with the backup generator would not contribute a substantial amount of emissions capable of exceeding MDAQMD thresholds. As stated above, the backup generator load factor would not exceed 80% of stated output for safety factor. All power

generation would be required to obtain the necessary MDAQMD permits. As such, the project is not anticipated to require a significant amount of electricity in the context of existing available power sources. The well and supporting infrastructure must be constructed in conformance with a variety of existing energy efficiency regulatory requirements or guidelines including, but not limited to the following:

- Compliance California Green Building Standards Code, AKA the CALGreen Code (Title 24, Part 11). The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of building through the use of building concepts encouraging sustainable construction practices.
- The provisions of the CALGreen code apply to the planning, design, operation, construction, use, and occupancy of every newly construction building.
- Compliance with the Building Energy Efficiency Standards (CBSC) would ensure that the building energy use associated with the proposed project would not be wasteful or unnecessary.
- Compliance with diversion of construction and demolition materials from landfills.
- Compliance with diesel exhaust emissions from diesel vehicles and off-road diesel vehicle/equipment operations.

Compliance with these regulatory requirements for operational energy use and construction energy use would not be wasteful or unnecessary use of energy. Further, SCE is presently in compliance with State renewable energy supply requirements and SCE would supply electricity to the project. The proposed project does not include any substantive new stationary or mobile sources of emissions, and therefore, by its very nature, would not generate substantive amounts of energy demand from project operations. The project does not propose a trip-generating land use or facilities that would generate any substantive amount of on-going energy demands. While it is anticipated that the project would require intermittent maintenance, such maintenance would be minimal requiring a negligible amount of traffic trips on an annual basis. As such, under the operational scenario for the proposed project, the proposed project would not result in wasteful, inefficient, or unnecessary energy consumption that could result in a significant adverse impact to energy issues based on compliance with the referenced laws, regulations and guidelines. No mitigation is required.

b. *Less Than Significant Impact* – The project's consistency with the applicable state and local plans is discussed below.

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the project site is provided by the local and regional roadway systems. The project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because Southern California Association of Governments is not planning for intermodal facilities on or through the project site.

Consistency with the Transportation Equity Act for the 21st Century (TEA-21)

The project site is located near major transportation corridors with proximate access to the Highway system. The site selected for the project facilitates access and acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and expands water infrastructure necessary to serve the District's customers. The project supports the strong planning processes emphasized under TEA-21. The project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Consistency with Integrated Energy Policy Report (IEPR)

Electricity would be provided to the project by SCE. SCE's Clean Power and Electrification Pathway white paper builds on existing state programs and policies. As such, the project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the IEPR.

Consistency with State of California Energy Plan

The sites selected for the project expands water infrastructure necessary to serve the District's customers. The project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2022 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2023. It should be noted that the analysis herein assumes compliance with the 2022 or most recently adopted Title 24 Standards.

Consistency with AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493 is not applicable to the project as it is a statewide measure establishing vehicle emissions standards. No feature of the project would interfere with implementation of the requirements under AB 1493.

Consistency with California's Renewable Portfolio Standard (RPS)

California's Renewable Portfolio Standard is not applicable to the project as it is a statewide measure that establishes a renewable energy mix. No feature of the project would interfere with implementation of the requirements under RPS.

Consistency with the Clean Energy and Pollution Reduction Act of 2015 (SB 350)

The proposed project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the project would interfere with implementation of SB 350.

Conclusion

As shown above, the project would not conflict with any of the state or local plans. As such, the proposed project would have a less than significant potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

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

SUBSTANTIATION

Impact Analysis

a. Ground Rupture

No Impact – According to the San Bernardino Countywide Plan Earthquake Fault Zone Map (**Figure VII-1**), the proposed project sites are located in an area that has not been mapped as containing geologic hazards, and therefore are not located in an Alquist Priolo Earthquake Fault

Zone. The nearest fault zone is approximately about 10 miles to the south at the San Gabriel Mountains. Further, there are fault traces that have not been identified as Alquist Priolo Fault Zones located to the north of the project site in El mirage Valley about 8 miles north of the project as shown on the United States Geological Survey (USGS) Quaternary Fault Map (**Figure VII-2**). As such, the project sites and general area do not contain any known faults, active or inactive. Therefore, no potential exists for the proposed project to experience any fault rupture along a delineated active fault.

Strong Seismic Ground Shaking

Less Than Significant Impact – The proposed project sites, as with most of southern California, are located in a seismically active area and would most likely be subject to substantial ground shaking during the life of the project. Due to the proximity of the nearby faults, located about 10 miles south of the project sites, the project area can be exposed to significant ground shaking during major earthquakes on either of these regional faults. This is illustrated on **Figures VII-1** and **VII-2**. Wells are not typically susceptible to severe damage from ground shaking. However, because there is a potential for the proposed well development to be subject to relatively strong ground motion, any structures associated with the development of the well would be designed to meet seismic specifications for the project area based on the current Uniform Building Code. No significant impacts are forecast to occur.

Seismic-related Ground Failure Including Liquefaction

No Impact – The proposed project is located in the community of Phelan. According to the San Bernardino Countywide Plan Liquefaction & Landslides Map (**Figure VII-3**), the project does not contain any land area with any liquefaction susceptibility. Therefore, it is not anticipated that the proposed project would be susceptible to seismic-related ground failure, including liquefaction. No impacts are anticipated and no mitigation is required.

Landslides

No Impact – The project area is relatively flat, sloping slightly from north to south. No hills or other significant topographic features exist on the project sites. According to the San Bernardino Countywide Plan Liquefaction & Landslides Map (**Figure VII-3**), the project is not located in an area that is susceptible to landslides. No potential events can be identified that would result in adverse effects from landslides or that would cause landslides that could expose people or structures to such an event as a result of project implementation. No impacts are anticipated and no mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – During construction, the project sites have a potential for soil erosion. The disturbance associated with trenching the pipeline alignment within the project sites to connect to the District's distribution system, as well as site clearing and grading where the well would be developed, may result in soil erosion. The project may result in exposing some soil to erosion during site grading activities before the well is drilled. The proposed well development project would result in land disturbance in the areas that would require construction within roadways and adjacent rights-of-way to accommodate the trenching required to install the transmission pipeline. Adequate drainage facilities exist to accommodate existing drainage flows,

and no change in drainage would result once the dirt roadway is recompacted and the pipeline is in place belowground. Implementation of BMPs through the mitigation measures provided below, in conjunction with **MM HYD-1** in the Hydrology and Water Quality section to control erosion is considered adequate to mitigate potential impacts associated with the water-related erosion of soil. Please refer to the discussion and mitigation measures addressing wind-related soils erosion (fugitive dust) in the Air Quality section and refer to **MMs AQ-1** through **AQ-6**.

GEO-1 ***Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of the material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup.***

GEO-2 ***Excavated areas shall be properly backfilled and compacted. Paved areas disturbed by this project would be repaved in such a manner that pipeline connections within adjacent roadways and other disturbed areas are returned to as near the pre-project condition as is feasible.***

GEO-3 ***All exposed, disturbed soil (trenches, stored backfill, etc.) would be sprayed with water or soil binders twice a day or more frequently if fugitive dust is observed migrating from either of the well sites within which the water facilities are being installed.***

GEO-4 ***The length of trench which can be left open at any given time would be limited to that needed to reasonably perform construction activities. This would serve to reduce the amount of backfill stored onsite at any given time.***

The following mitigation measure would be implemented to ensure the discharge of surface runoff from the sites does not result in significant soil erosion or loss of topsoil.

GEO-5 ***The District shall identify any additional BMPs to ensure that the discharge of surface water does not cause erosion downstream of the discharge point. This shall be accomplished by reducing the energy of any site discharge through an artificial energy dissipater or equivalent device. If any substantial erosion or sedimentation occurs, any erosion or sedimentation damage shall be restored to pre-discharge conditions.***

Implementation of the above measures in conjunction with mitigation measures identified in the Hydrology/Water Quality and Air Quality Sections would adequately mitigate potential impacts associated with the water-related erosion of soil.

c. *Less Than Significant Impact* – The coarse alluvial soils located at the project sites exhibit stability. Based on a review of the United States Department of Agriculture (USDA) Natural Resource Conservation Service Web Soil Survey of the project footprint, the soil underlying the project sites are Cajon Sand[3] and Manet Coarse Sand[4] (**54**). The Cajon series is well drained, and is in a low

[3] USDA, 2025. Cajon Series. https://soilseries.sc.egov.usda.gov/OSD_Docs/C/CAJON.html (Accessed 03/11/25)
[4] USDA, 2025. Manet Series. https://soilseries.sc.egov.usda.gov/OSD_Docs/M/MANET.html (Accessed 03/11/25)

runoff class, while the Manet series is well drained with slow runoff and moderately rapid permeability. This soil class is somewhat excessively drained; negligible to low runoff; and has rapid permeability. Best management practices (BMPs) have been identified in the preceding discussion to manage the wind and water erosion issues.

As stated under issues VII(a[iii]) and VII(a[iv]) above, the project footprint is not located in areas that are susceptible to landslides and liquefaction. This indicates that the project footprint and general area are unlikely to be underlain by unstable soils, or be affected by subsidence, lateral spreading, or collapse. Furthermore, damage to pipelines can occur, but can be repaired and placed back into operation with no loss of human life. Therefore, due to the nature of the proposed project, and the type of soil unit underlying the project site, the proposed project has a less than significant potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. No further mitigation is required.

d. *Less Than Significant Impact* – The project sites are generally flat, sloping only gently from north to south. The proposed project would develop a well at one of two proposed locations with associated pipelines and pipeline connections within the Community of Phelan. As stated above, the USDA Web Soil Survey indicates that the majority of the project area of potential effect (APE) is underlain by Cajon Sand and Manet Coarse Sand. Neither of these soil types are classified as being expansive under Table 18-1-B of the Uniform Building Code (1994), particularly as expansive soils are typically in the clay soil family. These classes of soil are well drained and are not considered expansive. Expansive soils are typically in the clay soil family, which are not present within the project footprint; furthermore, while damage to pipelines can occur, damaged pipelines can be repaired and placed back into operation with no loss of human life. Given the above, the proposed project would have a less than significant potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

e. *No Impact* – The project does not propose any septic tanks or alternative wastewater disposal systems. Therefore, determining if the project site soils are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply. No impacts are anticipated. No mitigation is required.

f. *Less Than Significant With Mitigation Incorporated* – The potential for discovering paleontological resources during development of the project is considered highly unlikely based on the fact that the project area is underlain by granite bedrock and the alluvial soils/sediment is relatively young. No unique geologic features are known or suspected to occur on or beneath the project footprint. However, because the project has not been surveyed at depth in recent history, and the fact that these resources are located beneath the surface and can only be discovered as a result of ground disturbing activities; therefore, the following measure shall be implemented:

GEO-6 ***Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the District's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of***

the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

With incorporation of this contingency mitigation, the potential for impact to paleontological resources would be reduces to a less than significant level. No additional mitigation is required.

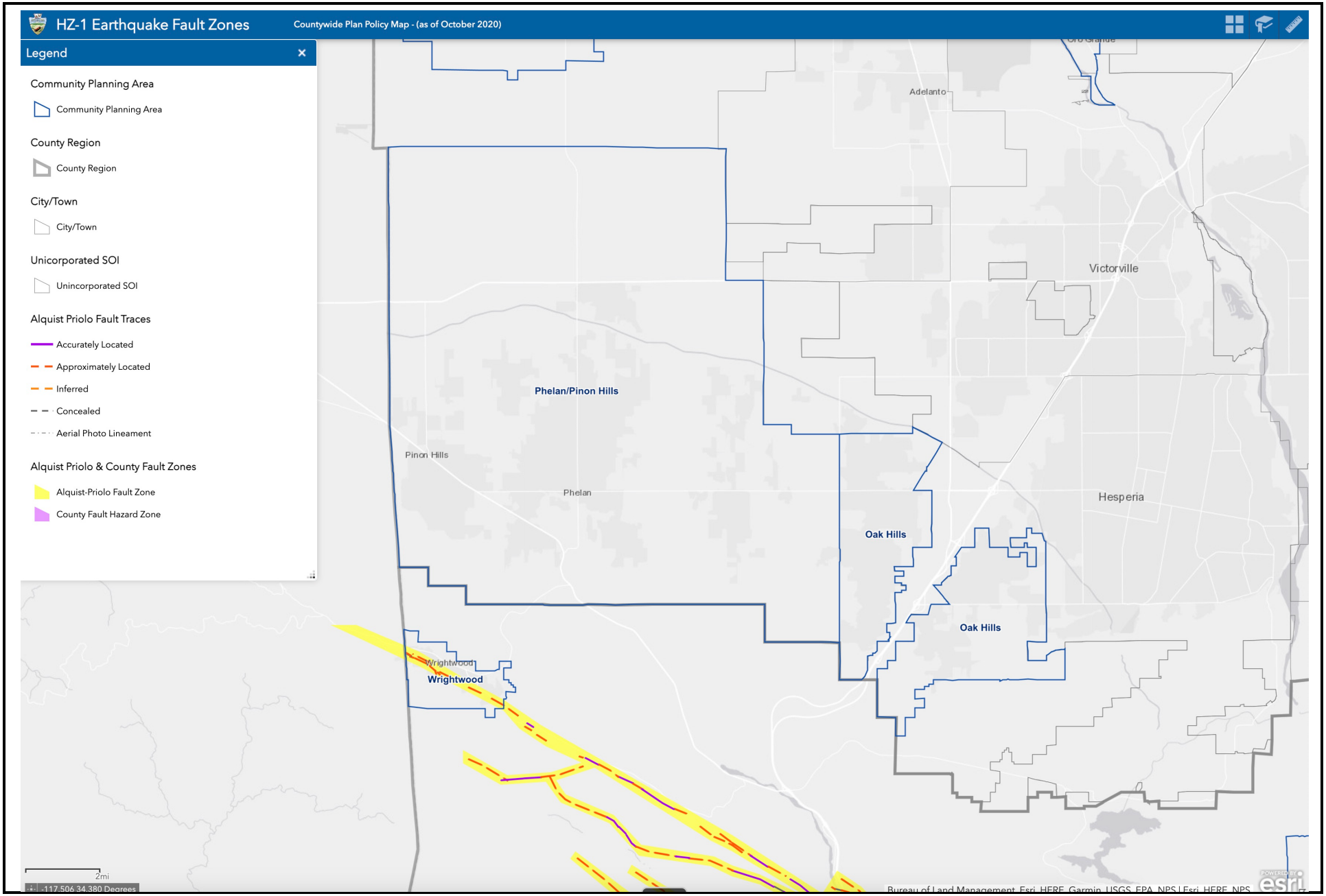

FIGURE VII-1

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Earthquake Fault Zones

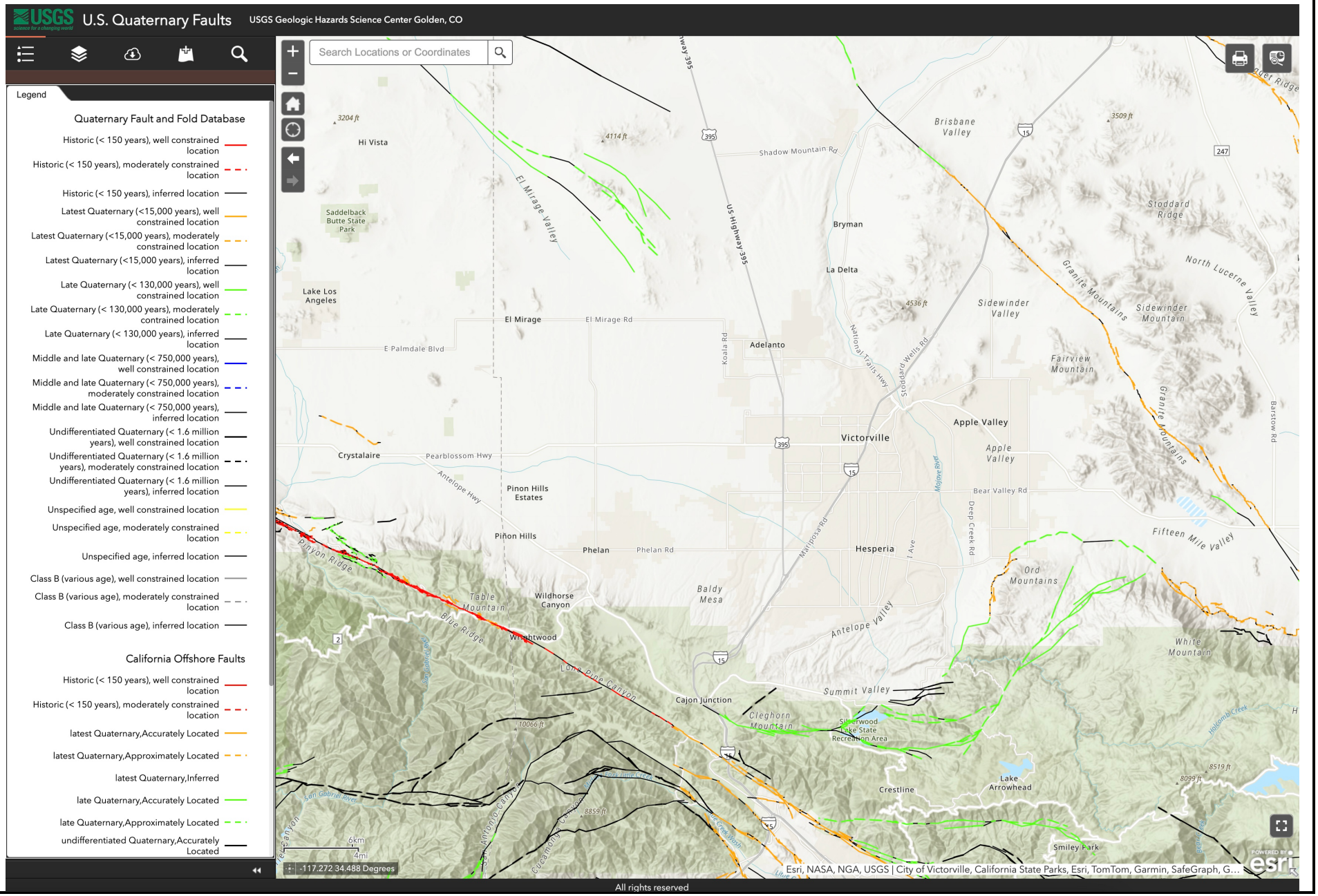

FIGURE VII-2

Tom Dodson & Associates
Environmental Consultants

USGS Quaternary Fault Map

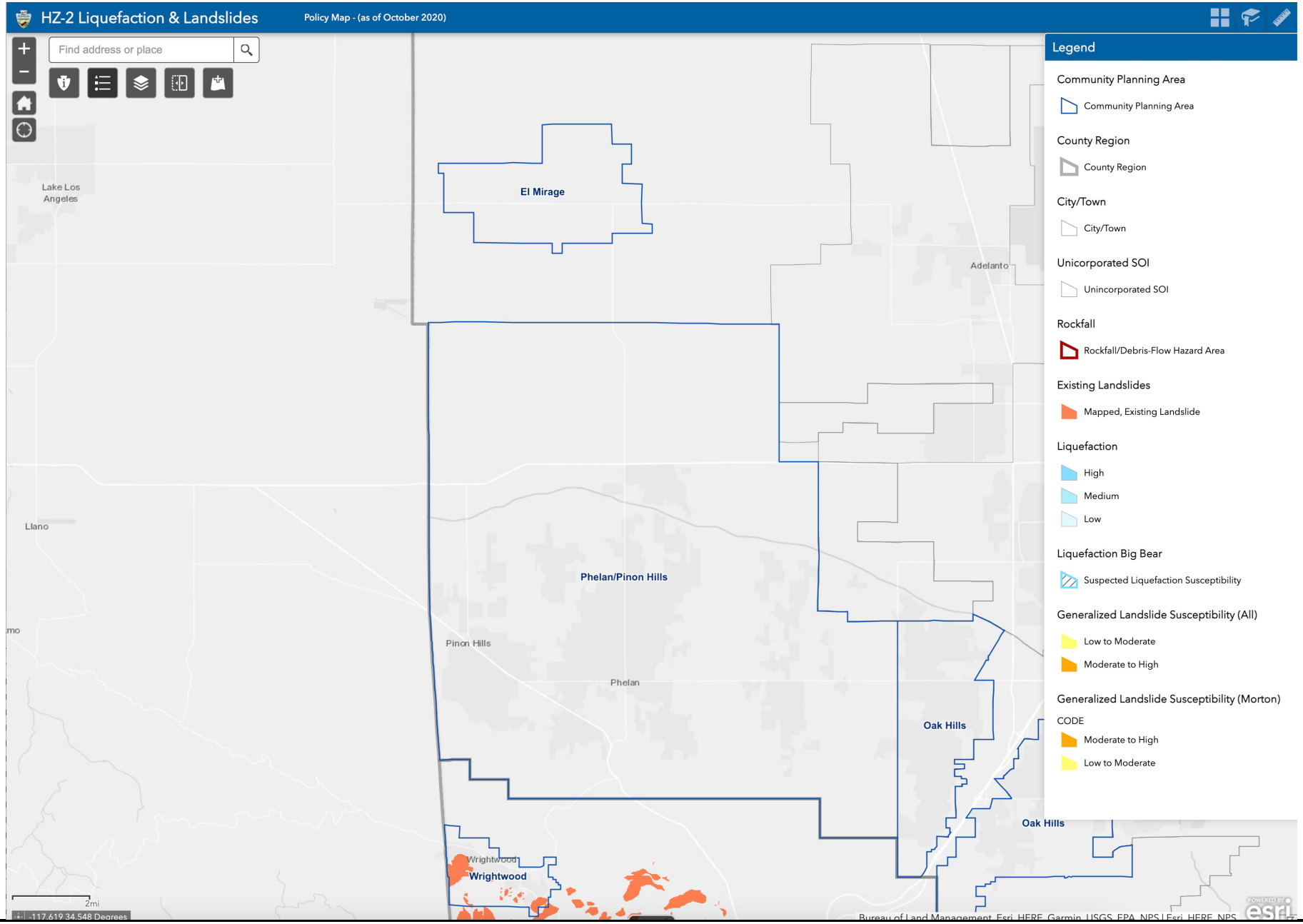

FIGURE VII-3

Tom Dodson & Associates
Environmental Consultants

Liquefaction and Landslide Map

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

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Community Services District (CSD) Well No. 18 Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated March 27, 2025. This AQGGA is provided as **Appendix 1** to this Initial Study.

Climate Change Setting

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

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

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

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's

average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and there are no accepted emissions factors or methodology to accurately calculate these gases.

Standards of Significance

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

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

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

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

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

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals

or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

Establishment of Significance Thresholds

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

Impact Analysis

a. *Less Than Significant Impact* – Greenhouse gas emissions from the project would primarily result from project-related traffic, generating mobile source emissions, as well as from stationary source emissions. As mentioned, the project mainly involves construction activities, and ongoing operations would generate mobile emissions from motor vehicles traveling to and from the site for periodic maintenance and inspections. However, the project is expected to generate a minimal number of trips and would not create significant long-term daily emissions sources.

While the project will generate some greenhouse gas emissions, it would significantly reduce reliance on imported water from distant sources. Transporting water from far-off locations requires substantial energy, whereas the energy needed for local water extraction is far lower, making the local well a more energy-efficient option.

The estimated GHG emissions for Project land use at either site are summarized in Tables VIII-1 and VIII-2. The estimated GHG emissions include emissions from Carbon Dioxide (CO_2), Methane (CH_4), Nitrous Oxide (N_2O), and Refrigerants (R). As shown in Tables VIII-1 and VIII-2, at both the Well 18 site and the Backup Well site, the project would generate either a total of approximately 244.45 $MTCO_2e/yr$ or 244.58 $MTCO_2e/yr$.

Table VIII-1: Total Project GHG Emissions (Well 18)

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Annual construction emissions amortized over 30 years	2.14	8.69E-05	1.95E-05	1.06E-04	2.15
Energy	235.55	0.02	0.00	0.00	236.92
Stationary	5.36	0.00	0.00	0.00	5.38
Total CO_2e (All Sources)	244.45				
Screening Threshold (CO_2e)	3,000				
Threshold Exceeded?	NO				

Table VIII-2: Total Project GHG Emissions (Backup Well)

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Annual construction emissions amortized over 30 years	2.28	9.25E-05	2.13E-05	1.53E-04	2.28
Energy	235.55	0.02	0.00	0.00	236.92
Stationary	5.36	0.00	0.00	0.00	5.38
Total CO_2e (All Sources)	244.58				
Screening Threshold (CO_2e)	3,000				
Threshold Exceeded?	NO				

As previously shown in Tables VIII-1 and VIII-2, the project will result in either approximately 244.45 $MTCO_2e$/yr or 244.58 $MTCO_2e$/yr, which would not exceed the screening threshold of 3,000 $MTCO_2e$/yr . This would be considered a less than significant impact. Detailed construction and operation model outputs are presented in Appendices 1 and 2 of the AQGGA. As the project will not exceed the screening threshold of 3,000 $MTCO_2e$/yr, the proposed project would result in a less than significant impact.

b. *Less Than Significant Impact* – Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 % below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon. Thus, the proposed project would have a less than significant potential to conflict with any applicable plan, policy, or regulation of an agency for the purposes of reducing the emissions of GHGs. No mitigation is required.

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

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, operation of the proposed PPHCSD well is anticipated to require treatment prior to connecting to the District's existing distribution system. It is anticipated that the well site would store chemicals required for the treating of water extracted from the well. It is unknown at this time what treatment would be required for the well to meet the standards of the State Water Resources Control

Board (SWRCB) Division of Drinking Water (DDW). However, the proposed project is anticipated to install a structure to house the sodium hypochlorite required to chlorinate the water extracted at Well No. 18, and this substance is considered a potentially hazardous substance. The District would comply with State standards. Furthermore, the District has developed safety standards and operational procedures for safe transport and use of its operational and maintenance materials that are potentially hazardous. These procedures would comply with all federal, state and local regulations would ensure that the project operates in a manner that poses no substantial hazards to the public or the environment. No additional mitigation is necessary to ensure the impact of managing these chemicals result in a less than significant impact on the environment. Therefore, potential impacts to the public or the environment through accidental release due to the routine transport, use, or disposal of hazardous materials would be less than significant. The District has standard operational procedures for safe transport and use of its operational and maintenance materials. No additional measures are necessary to ensure the impact of managing this chemical result in a less than significant impact on the environment.

b. *Less Than Significant With Mitigation Incorporated* – During construction or maintenance activities in support of the proposed project, fuels, oils, solvents, and other petroleum materials classified as "hazardous" would be used to support these operations. Mitigation designed to reduce, control or remediate potential accidental releases must be implemented to prevent the creation of new contaminated areas that may require remediation in the future and to minimize exposure of humans to public health risks from accidental releases. The following mitigation measure reduce such accidental spill hazards to a less than significant level:

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

By implementing this measure, potentially substantial adverse environmental impacts from accidental releases associated with installation of the proposed well can be reduced to a less than significant level. Additionally, roadways adjacent to and within the project footprint are public roads that can be used by any common carrier to or from the local area. For such transporters, the existing regulatory mandates ensure that the hazardous materials and any hazardous wastes transported to and from the project site would be properly managed. These regulations are codified in Titles 8, 22, and 26 of the California Code of Regulations. For example, maintenance trucks for construction equipment must transport their hazardous materials in appropriate containers, such as tanks or other storage devices. In addition, the haulers must comply with all existing applicable federal, state and local laws and regulations regarding transport, use, disposal, handling and storage of hazardous wastes and material, including storage, collection and disposal. Compliance with these laws and regulations related to transportation would minimize potential exposure of humans or the environment to significant hazards from transport of such materials and wastes.

The proposed 600 to 1,800 LF pipeline required to connect the proposed Well No. 18 would be installed underground within existing compacted dirt roadways; once constructed, the roadways would be recompacted to their original condition. Thus, once constructed, the pipeline would not require or result in transport, use, or disposal of hazardous materials. Therefore, with implementation of the identified mitigation measure, impacts are considered less than significant.

c. *Less Than Significant Impact* – The two well sites are not located within one quarter mile of a school; however, it is not anticipated to emit hazardous emissions or handle hazardous materials or substances that would cause a significant impact to a local school. The nearest schools are more than 5 miles to the south of the project site nearer to Highway 138. Given the safety measures in place for the chemicals required to operate the proposed well, it is not anticipated that the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste during construction or operation in a quantity that would pose any danger to people adjacent to, or in the general vicinity of, the project site. Therefore, the impacts of the proposed project to this issue area would be considered less than significant.

d. *No Impact* – The proposed project would not be located on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. None of the proposed actions related to the development of the new well would be near to or impact a site known to have hazardous materials or a site under remediation for hazardous materials or associated issues. A review of the California State Water Resources Control Board GeoTracker database indicates that no open hazardous materials cleanup sites are located within a 5,000 radius of the proposed well development sites and respective pipeline alignments (**Figures IX-1**). There are no nearby open or closed Leaking Underground Storage Tank (LUST) Cleanup sites. Therefore, the proposed project is not forecast to result in a significant hazard to the public or the environment associated with this issue area. No impacts under this issue are anticipated and no mitigation is required.

e. *No Impact* – According to the San Bernardino Countywide Plan Airport Map (**Figure IX-2**), the closest public airport to the Well sites is the Southern California Logistics Airport, which is located approximately 11 miles to the east/northeast of the project site. The nearest private airports are Gray Butte Field, Krey Field, and Brian Ranch Airports are all located more than 5 miles from the project area. Due to the distance from these private airports, as well as the distance from the Southern California Logistics Airport and the lack of any habitable structures on the project sites, implementation of the project would not result in an exposure to a safety hazard for the people working in the project area. No impacts are anticipated and no mitigation is required.

f. *Less Than Significant With Mitigation Incorporated* – The proposed well development would be confined to the one of the two proposed project sites and is not anticipated to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The pipeline that would connect the new well to the District's potable water system would involve a small amount of work within Beekley Road or Camellia Road during construction, but this would occur during a limited period of time. A limited potential to interfere with an emergency response or evacuation plan would occur during construction. At no time during the installation of pipeline would the entirety of these roadways be closed. The project would require one lane to be closed, which would allow for through-traffic so long as a traffic management plan is developed and implemented. As such, please refer to the Transportation/Traffic Section of this

document, Section XVII. Mitigation (**MM TRAN-1**) to address any potential traffic disruption and emergency access issues on area roadways are included in this section. Impacts are reduced to a less than significant level with mitigation incorporated. No additional mitigation is required.

g. *Less Than Significant Impact* – The proposed project would not 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. The proposed project area is located about 10 miles north of the San Gabriel Mountains. The proposed project is located within a moderate fire hazard severity zone as designated by CAL FIRE (**Figure IX-3**), but according to Section 8 – Safety of the Phelan Community Plan (p.54)[5], fire hazard severity is very high only in limited areas, south of Highway 138. As the proposed project is not located in a high or very high fire hazard severity zone, the fire threat throughout most of the community plan area is considered moderate. The proposed well development would not expose people or structures to a significant risk of loss, injury or death involving wildland fires as the well sites would not be located in the vicinity of the high wildland fire hazard area. The project sites are north of Highway 138 and are in areas without sufficient fuel load to pose a significant wildland fire hazard. Impacts under this issue are considered less than significant.

[5] San Bernardino County, 2007. Phelan Community Plan https://www.sbcounty.gov/uploads/lus/communityplans/phelanpinonhillscp.pdf (Accessed 03/1/25)

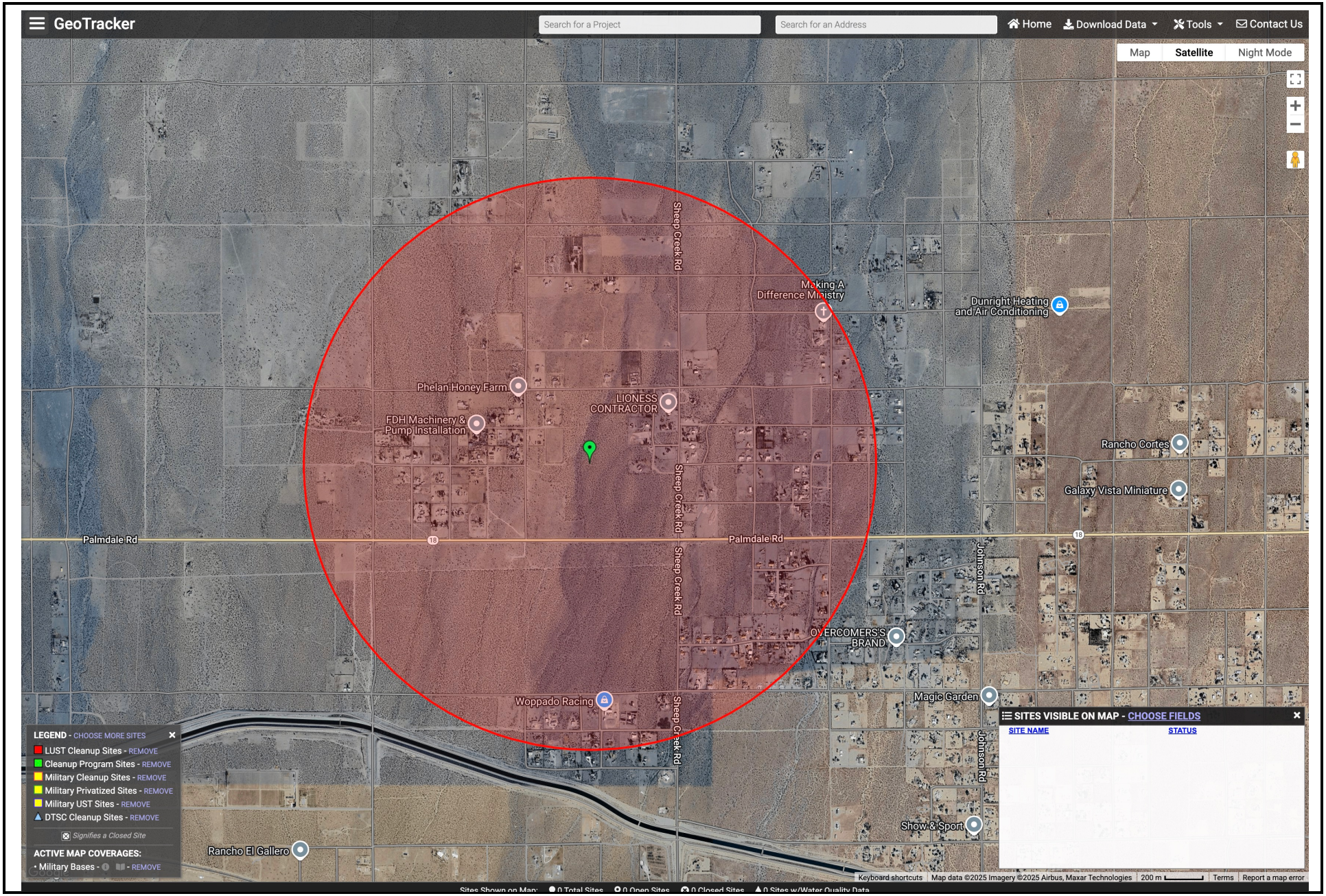

FIGURE IX-1

Tom Dodson & Associates
Environmental Consultants

GeoTracker Map

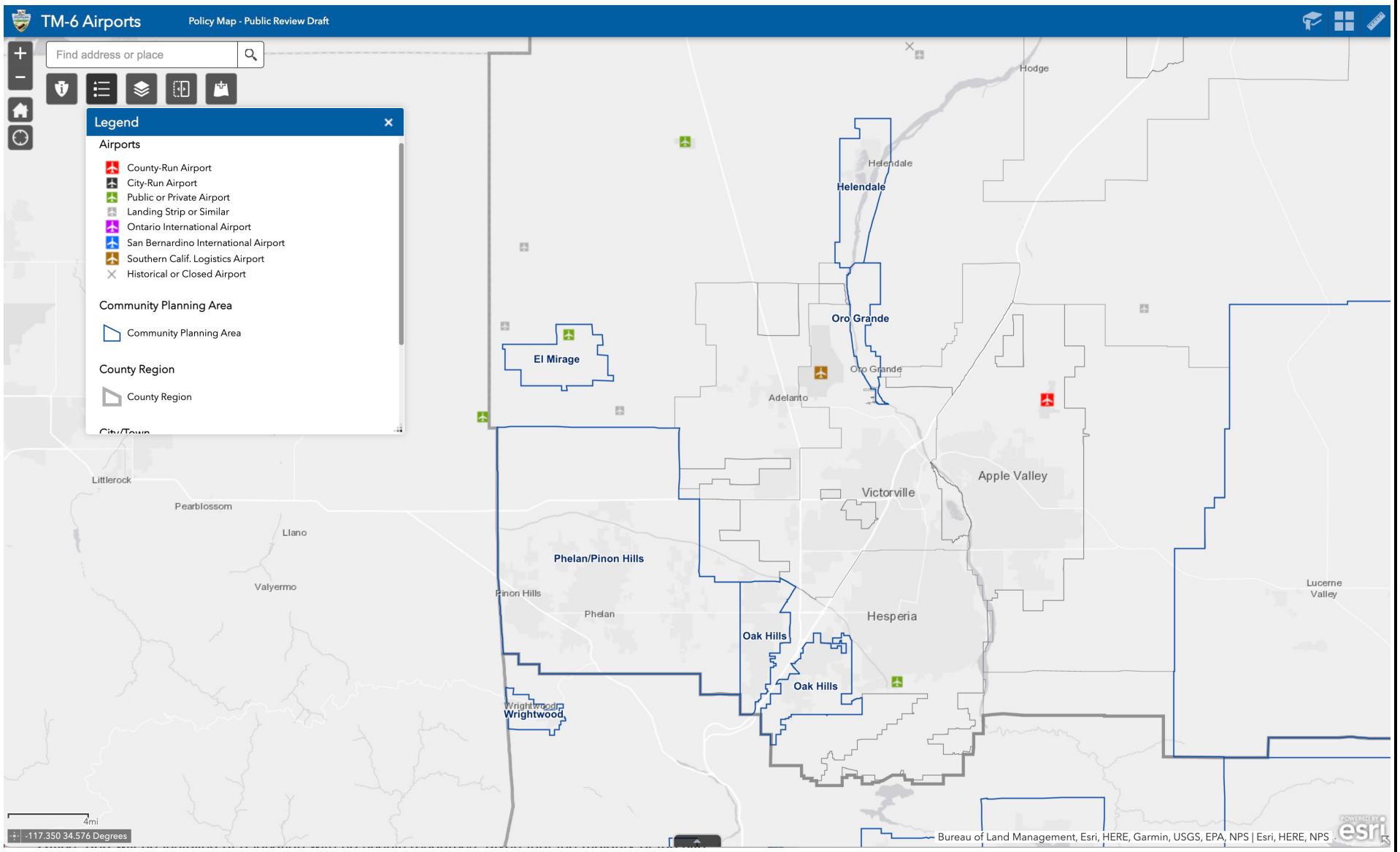

FIGURE IX-2

Tom Dodson & Associates
Environmental Consultants

Airports Map

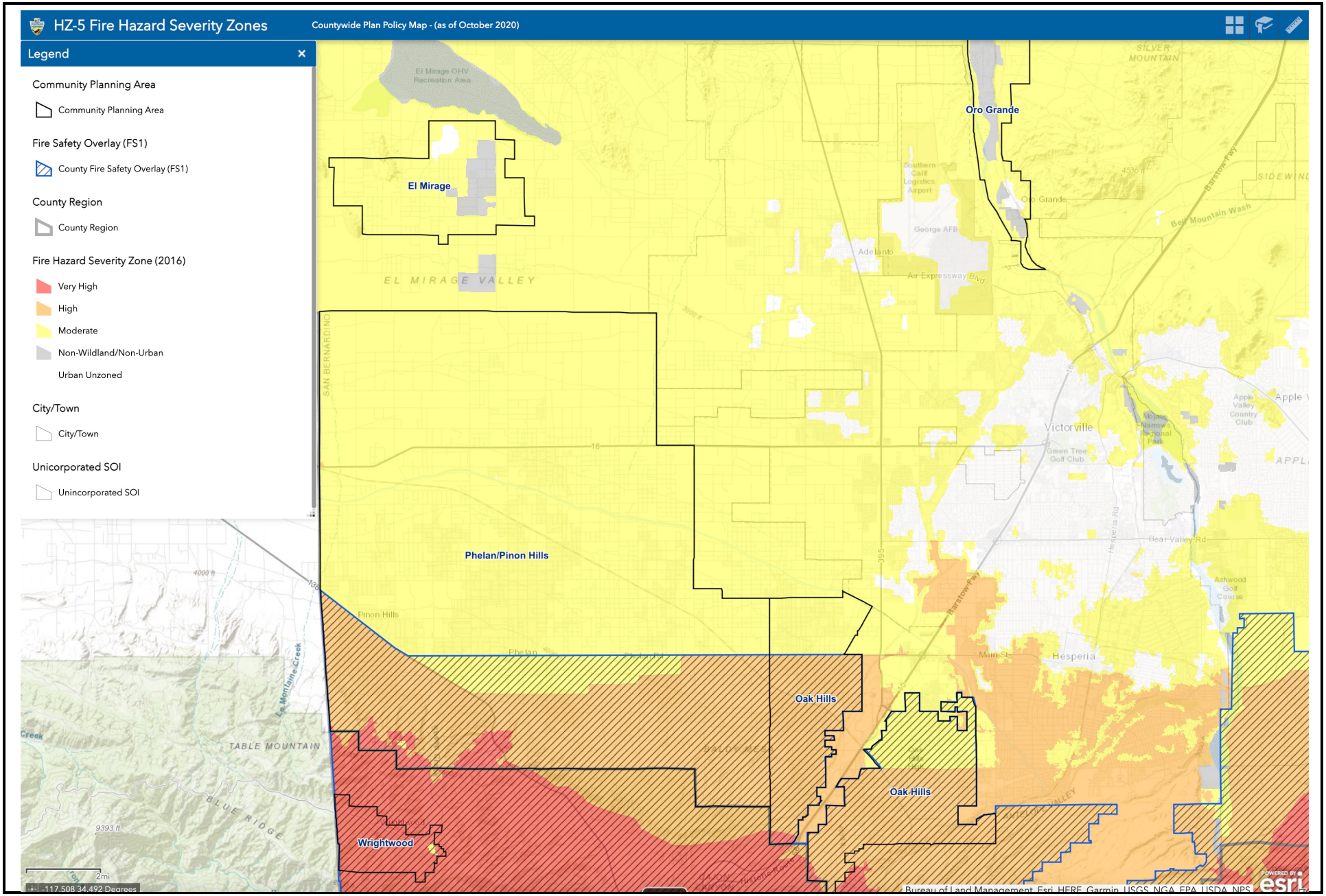

FIGURE IX-3

Tom Dodson & Associates
Environmental Consultants

Fire Hazard Severity Zone Map

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

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – Installation of the proposed well and connecting pipeline includes activities that have a potential to violate water quality standards or waste discharge requirements due to direct discharge of water brought to the surface during well testing. Prior to pumping large quantities of water from the proposed municipal-supply water well, PPHCSD would need to test the quality of the water to verify that it does not contain contaminants that would exceed the standard water quality objectives for this portion of the South Lahontan

Watershed. The RWQCB would have jurisdiction over the groundwater quality and surface water discharges for the new well. A General Permit within the Regional Board's jurisdiction covers the discharge of groundwater generated from well drilling and development activities. This General Permit establishes specific performance requirements for discharges from well activities and the proposed project must comply with these requirements. Before discharge from the well testing program can proceed, sampling must be completed to ensure that maximum contaminant levels (MCLs) are not exceeded in the groundwater brought to the surface and discharged. If water quality at the proposed well is degraded it must be blended to a level below MCLs or any specific pollutant exceeding MCLs must be treated and brought into compliance with General Permit discharge requirements prior to discharge to meet the MCL requirements for that pollutant. The following mitigation measure ensures that no significantly degraded groundwater (above MCLs) would be discharged during well testing:

HYD-1 ***The District shall test the groundwater produced from the well prior to discharge. Prior to or during discharge any contaminants shall be blended below the pertinent MCL or treated, including sediment or other material.***

HYD-2 ***The District shall prepare a Drilling Plan that describes the drilling method and construction contingencies to be employed. That plan shall describe waste management control and disposal methods for cuttings, mud, and development water discharges. The Drilling Plan should identify, and illustrate on appropriate scale maps, the Best Management Practices (BMPs) that would be employed to ensure there are no adverse effects on ground or surface water quality; these BMPs shall ensure that the well purge, development water, and pipeline hydrostatic testing discharges not discharge to a stream channel or tributary of a water of the United States, including discharges to land, under requirements specified in General Board Order No. 2003-0003-DWQ. The District shall indicate how they would implement and monitoring the effectiveness of installed BMPs, and make necessary adjustments in the field if necessary to modify those BMPs and protect water quality. The Drilling Plan shall be made available to the Lahonton Regional Water Quality Control Board for their records.***

The proposed project may result in some soil erosion during drilling and construction activities. Due to the disturbed nature of the project site, and the flat topography of each site, it is concluded that the potential for this project to cause substantial soil erosion, and subsequent water quality impacts, is low. Due to the small size of the proposed project (less than one acre), a Storm Water Pollution Prevention Plan (SWPPP) is not required. However, the District shall implement Best Management Practices (BMPs) during construction, which will be enforced by the following mitigation measure:

HYD-3 ***The District shall require that the construction contractor to implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the District include the following:***

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

Implementation of the above mitigation measures, as well as **MMs HAZ-1**, and **HYD-4** below, is considered adequate to reduce potential impacts to stormwater runoff to a less than significant level. The project would have a less than significant impact under this issue. No further mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a substantial lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). All water delivered by the District to each customer's faucet comes directly from two local groundwater basins. Together, the groundwater basins contain over 600,000 acre-feet of water, or over 195 billion gallons.[6] The District pumps groundwater from the Oeste Subarea and Alto Subarea of the Mojave Basin Area (MBA) and from the Antelope Valley Adjudication Area (AVAA). The proposed well would pump from the Oeste Subarea of the MBA. The MBA was adjudicated by the Mojave Basin Area Judgment (MBA Judgment) that was settled in 1996 due to rapid growth within the area and overdraft issues. As a Producer utilizing groundwater within the adjudicated MBA, the District is subject to the MBA Judgement, and as such, if it exceeds the allotted Free Production Allowance, the Producer must pay the Mojave Water Agency (MWA)—the Watermaster of the MBA—a Replacement Water Assessment. MWA has invested in a groundwater replenishment system to manage and help sustain the groundwater resources of the MBA since the MBA Judgment. Purchased water from the State Water Project (SWP) has been discharged to the MBA via the Mojave River Pipeline since 2006.[7] The proposed new well is forecast to increase groundwater extraction by an estimated 600 acre feet per year (AFY). The proposed depth of water production from these well is anticipated to be approximately 1,000 feet below the ground surface (bgs), or as directed by the hydrogeologist. The well is not designed to interfere with any private wells located within the same aquifer. However, since pumping tests would not be conducted until the proposed well is completed, the following mitigation measure shall be implemented by the District to ensure that other wells within this local aquifer do not incur a significant adverse impact from pumping the proposed well.

[6] PPHCSD, 2024. District Transparency. https://www.pphcsd.org/transparency.html (accessed 02/12/24)
[7] PPHCSD, 2024. Phelan Piñon Hills Community Services District 2020 Urban Water Management Plan.

HYD-4 ***The District shall conduct a pump test of the new well and determine whether any other wells are located within the cone of depression once the well reaches equilibrium. If any private wells are adversely impacted by future groundwater extractions from the proposed well, the District shall offset this impact through provision of water service; or adjusting the flow rates or hours of operation to mitigate adverse impacts.***

Ultimately, through payment to MWA for water pumped to supplement their current water supply, the proposed project would ensure that the required supply would be replaced to ensure that impacts to the MBA would be less than significant. As such, with implementation of the above mitigation measure, the impacts to this issue would be reduced to less than significant. No additional mitigation is required.

c. i-iii

Less Than Significant With Mitigation Incorporated – The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite, or 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. The proposed project footprint varies from disturbed compacted dirt to containing native and non-native vegetation, as such, once the well is installed, the drainage pattern of the area of disturbance would not change substantially. It is not anticipated that substantial erosion or siltation would occur on site, given that the drainage would be managed as it is at present. The well sites would require minimal grading and site clearing in the small areas in which the well would be installed, and as such would have a less than significant potential to interfere with the discharge of stormwater over the long-term as the site would remain essentially the same, with only the small area that would be disturbed as a result of the well development and pipeline installation. Furthermore, because the development of the well would alter the site only minimally, the project would not increase the amount of surface runoff, such that flooding on- or off-site would occur.

Counties require implementation of a set of BMPs to control discharges that surface runoff with pollutants could cause that may cause a significant adverse impact to surface water quality. Storm water pollution prevention BMPs would be incorporated to control pollution from construction activities in the vicinity of the project site. These measures, such as berms, coil rolls, silt fencing, detention basins, etc., are mandatory, as are the measures for ongoing non-point source pollution controls implemented by the local jurisdictions once the project is completed. The mandatory BMPs applied in conjunction with Mitigation Measures **HAZ-1**, and **HYD-3** in conjunction with measure **HYD-5** below, are deemed sufficient to reduce potential surface water quality impacts to a less than significant level. This is because the stormwater discharge would be treated to the point that the discharge would meet requirements for stormwater runoff from construction sites.

HYD-5 ***The District and construction contractor shall select best management practices applicable to the project site and activities on the site to achieve a reduction in pollutants to the maximum extent practicable, both during and following development of the proposed municipal-supply water well and associated pipeline,***

and to control urban runoff after the project is constructed and the well (if approved for operation post well testing) are in operation. This shall include, but shall not be limited to the provision of adequate setback distances from any creek to protect against scouring and erosion of the pipeline fill during strong storm events. An engineered landscape embankment system shall be designed to ensure adequate protection against exposing the new constructed pipeline during flooding events.

The dirt roadways within which the pipelines would be installed would be returned to their original condition upon completion of the placement of each section of pipeline. The roadways would generate essentially the same amount of stormwater as they do at present because no expansion of roadway or change in drainage patterns are anticipated. Conveyance of stormwater to drainage alignments and storm drains within these roadways would remain intact and unchanged once construction has been completed. No substantial change to the existing drainage pattern would result from project implementation. Adequate drainage facilities exist to accommodate pre- and post-project drainage flows, and would therefore result in a less than significant impact. Based on the data outlined above, this project would not substantially alter the existing drainage pattern of the site or area; result in substantial erosion or siltation onsite or offsite; substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or, 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. Therefore, with the mitigation measure identified above, impacts under these issues are considered less than significant. No further mitigation is required.

c. iv

Less Than Significant Impact – According to the San Bernardino Countywide Plan Flood Hazard Map, provided as **Figure X-1**, neither well site is located within 100-year flood zone. The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) prepared for each of the well sites (**Figures X-2 and X-3**) delineates the well sites as being located in Zone D, which is for areas of undetermined flood hazards. The location of the well, regardless of the site selected, would be outside of roadways, and drainage would be managed within the site. The proposed pipeline would be installed belowground, and once installed, the roadways would be returned to their original condition, thus minimizing the potential for drainage patterns to be altered. Therefore, the proposed project would have a less than significant potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would impede or redirect flows. No mitigation is required.

d. *Less Than Significant Impact* – Please refer to the discussion under c(iv) above. As stated above, neither well site is located within 100-year flood zone (**Figures X-1, X-2, and X-3**). The groundwater extracted from the proposed well is not anticipated to contain any pollutants that would harm the above-ground environment. Furthermore, the well water and any treatment thereof would be self-contained, and as such, risk for accidental release of any water extracted from the well is anticipated to be extremely low. The proposed project is not located near any bodies of water that would place the well within a seiche zone, and is far removed from the Pacific Ocean, such that no tsunami would affect the project area. As previously stated, BMPs in place would ensure that the minimal potential for pollutants that may occur on site would not be released in the event of project inundation. Therefore, impacts under this issue are considered less than significant.

e. *Less Than Significant Impact* – Please refer to the discussion under issue X(b) above. The Sustainable Groundwater Management Act (SGMA) "requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that would be 2040. For the remaining high and medium priority basins, 2042 is the deadline."[8] The Mojave River Basin is under very low priority. As the Mojave River Basin is under very low priority, it is currently not required to prepare a sustainable groundwater management plan and the project would not interfere with the overall water quality of the MBA as discussed above. As stated above under issue X(b), the MWA Watermaster manages transfers from the Groundwater Basin and assesses a fee commensurate with the amount of water extracted. Though the Groundwater Basin has several sub-basins that have experienced overdraft in the last 10 years, the Watermaster replaces overdrafts through fees collected from water users that is used to purchase additional water supplied through the State Water Project. As such, the payment of this fee would ensure that the proposed project is in compliance with the MWA Watermaster, and as such, it is not anticipated that the proposed well development project would have a significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

[8] California Department of Water Resources, 2025. Sustainable Groundwater Management Act. https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management (Accessed 03/26/25)

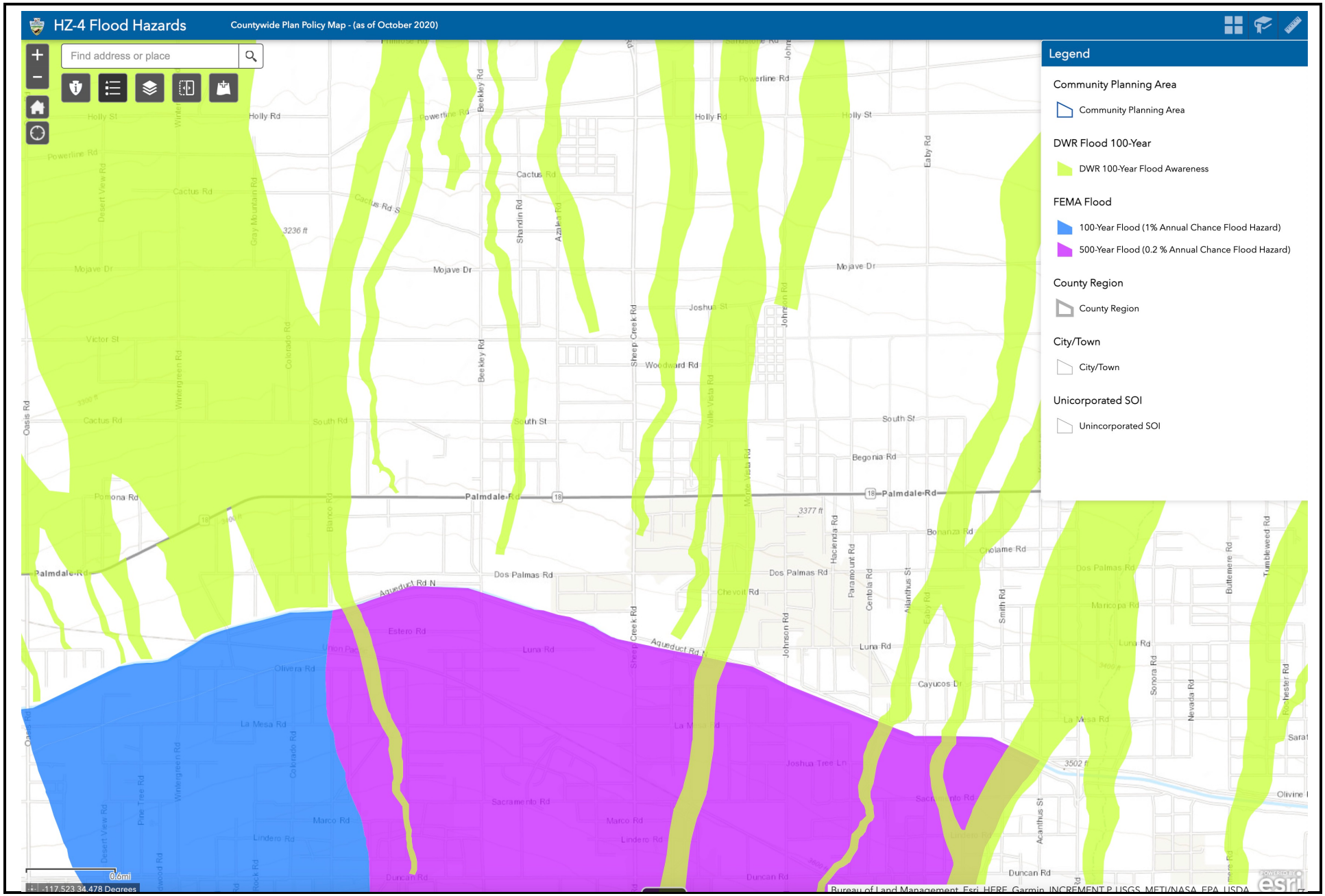

FIGURE X-1

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Flood Hazards Map

National Flood Hazard Layer FIRMette

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/10/2025 at 10:57 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

FIGURE X-2

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National Flood Hazard Layer FIRMette Backup Well

National Flood Hazard Layer FIRMette

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/10/2025 at 10:58 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

FIGURE X-3

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National Flood Hazard Layer FIRMette Well 18

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

SUBSTANTIATION

Impact Analysis

a. *No Impact* – According to the San Bernardino Countywide Plan Land Use Map, the Land Use designations of the project sites are Rural Living (RL) PH/RL-5 and Very Low Density Residential (VLDR). Though the proposed project includes pipeline alignments, the land uses surrounding the project footprint are all designated for these same uses. The proposed pipeline is anticipated to be constructed primarily within existing public rights-of-way, and the well would be installed within one of two sites that do not contain any existing structures or housing. There are no features of the well that would create a barrier or physically divide an established community, particularly given that wells are typically integrated into the landscape unobtrusively. Thus, the project does not involve construction of new structures that would cause any physical division of communities. Since the proposed project occurs within and supports existing land use designations, no potential exists for the proposed project to physically divide an existing community. No impact would result and no mitigation is required.

b. *No Impact* – Please refer to the discussion under issue XI(a) above. The well would be located on one of two vacant parcels. In general, water production facilities are zone independent because they are needed to support all types of land uses. Per Government Code Section 53091, building ordinances of local cities or counties do not apply to the location or construction of facilities for the projection, generation, storage, treatment, or transmission of water or wastewater. Therefore, any project facilities that could potentially conflict with local General Plan land use designations would not be subject to a conditional use permit or general plan amendment. The County of San Bernardino Countywide Plan supports the provision of adequate infrastructure; therefore, the project would not conflict with the goals and policies of the applicable General Plans. Thus, implementation would not 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 or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. No impacts are anticipated and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* -- Implementation of the Project would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of the state. According to the Geologic Map of the Shadow Mountain Quadrangle from the California Department of Conservation, the project sites are located on alluvial soils. Alluvial soils are not a unique soil classification in the project vicinity, as well as in southern California. In addition, neither the project sites nor surrounding vicinity have been mined in the past. If mineral resources were present on the project sites, then there would have been historic operations on the project sites to commercially extract these resources. Based on this information, any impacts to mineral resources from implementing the Project would be considered less than significant. No mitigation is required.

b. *No Impact* – Please reference response XII(a) above. While the San Bernardino Countywide Plan does contain Goals and Policies that related to mineral resources (Goal NR-6.1, NR-6.2, and NR-6.3 of the San Bernardino County General Plan), the project sites have not been historically mined for important mineral resources, and are not located on the Countywide Plan Mineral Resource Zone Map (**Figure XII-1**). No specific plan or other land use plan is in place that would delineate important mineral resources on the project site. Based on this information, no impacts to mineral resources from implementing the project are anticipated. No mitigation is required.

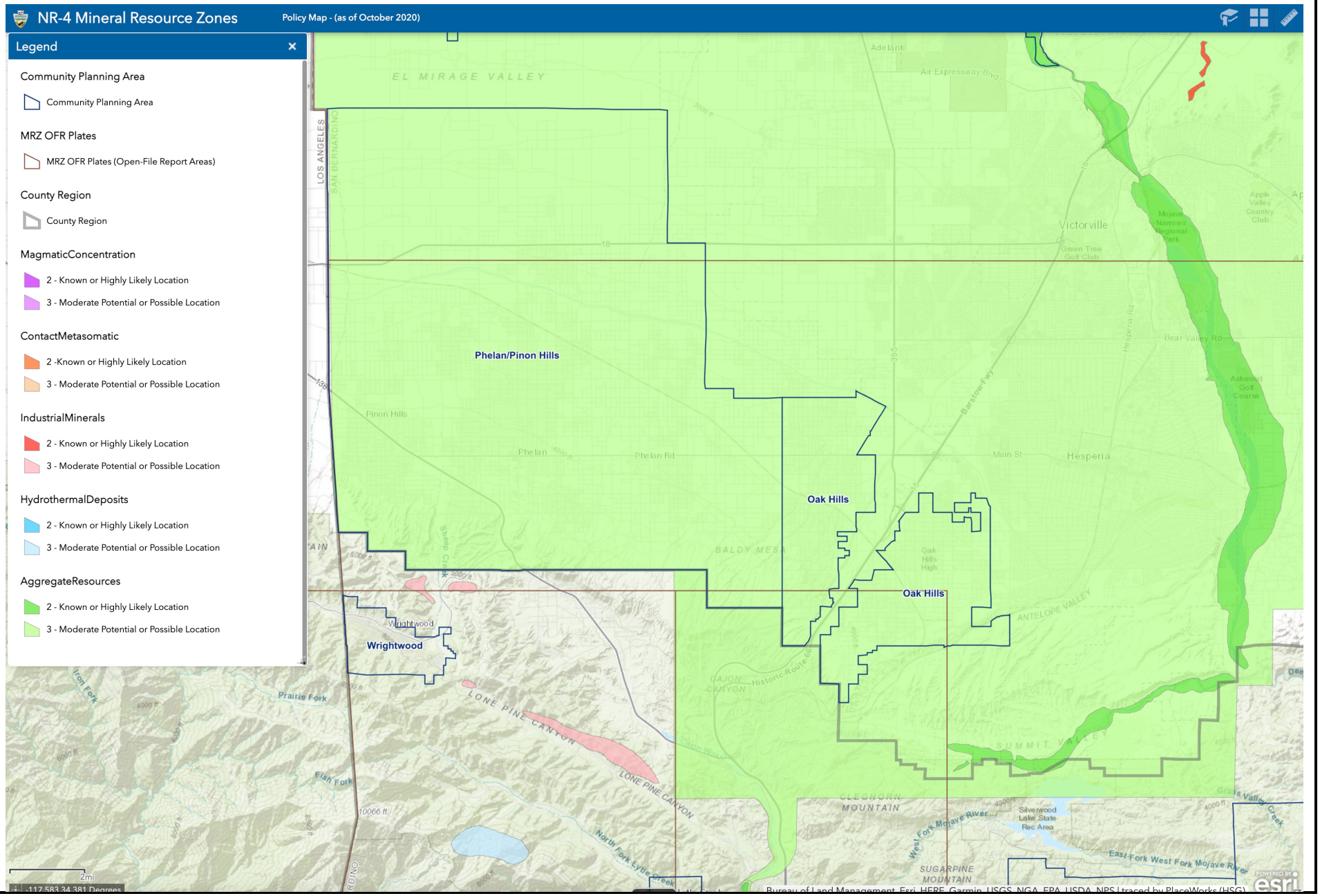

FIGURE XII-1

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Mineral Resource Zones

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

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Community Services District (CSD) Noise Assessment* (NA) prepared by Urban Crossroads, dated April 8, 2025. This NA is provided as **Appendix 6** to this Initial Study.

Background

Noise is generally described as unwanted sound. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. **Exhibit XIII-1** presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below.

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet flyover noises equate to 110 dBA at approximately 1,000 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

Exhibit XIII-1: Typical Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Receiver Locations

To assess the potential for noise impacts, the following receiver locations, as shown in **Figure XIII-1**, were identified as representative locations for analysis. Sensitive uses or receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. To describe the potential off-site Project noise levels, eight receiver locations in the vicinity of the Project site were identified, including the location of the nearest existing noise-sensitive residential receiver (R6), located approximately 41 feet south of the pipeline and Backup Well site boundaries.

The selection of receiver locations is based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures.

Noise Prediction Model

To fully describe the exterior operational noise levels from the Project, Urban Crossroads, Inc. developed a noise prediction model using the CadnaA (Computer Aided Noise Abatement) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. Using the ISO 9613-2 protocol, CadnaA will calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level

contributions by noise source. The noise level calculations provided in this noise assessment account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used in the CadnaA noise analysis to account for mixed ground representing a combination of hard and soft surfaces.

Construction Noise Regulations

Section 83.01.080(g)(3) of the San Bernardino Development Code, indicates that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. to 7:00 p.m. except on Sundays and Federal holidays. However, neither the San Bernardino Countywide Plan or County Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a *substantial temporary or periodic noise increase*. However, neither the General Plan nor the Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. Therefore, a numerical construction threshold based on the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual is used for the analysis of daytime and nighttime construction impacts. When conducting a detailed construction analysis, the FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} and a nighttime exterior construction noise level of 70 dBA L_{eq} as a reasonable threshold for noise-sensitive residential land use.

Construction Noise Sources

Using reference construction equipment noise levels level measurements and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearest sensitive receiver locations were completed. To assess the worst-case construction noise levels, the Project construction noise analysis assumes the well drilling activities will operate continuously over a 24-hour period. The well construction locations, relative to the receivers, are shown in **Figure XIII-2 and XIII-3**.

Construction of the pipelines includes roadway excavation, pipeline installation, roadbed backfilling, and grading activities. Since the existing alignments are unpaved, no paving is anticipated. It is anticipated that pipelines will be constructed with multiple teams. However, pipeline construction would not physically overlap, rather, improvements would occur in multiple locations along the alignment and represent individual events at multiple locations. Construction along the unpaved roadways would extend 400-500 linear feet per day.

Drill rigs have several substantial noise sources, each with its own characteristics. The main sources of noise are the generator sets, the compressors, the mud pumps, and the top drive. Pumps/compressors and generator noise sources were placed five feet above ground level, and the drill rig top drive was placed fifteen feet above ground level. Drill rig and associated equipment noise levels were developed from a noise survey conducted by Behrens and Associates, Inc. of three different drill rig systems in 2006. Each of the drill rigs was rated at 1,000 horsepower and was capable of drilling depths ranging from 12,000 to 15,000 feet. The surveyed drill rigs are similar in capability to the drill rig proposed for the Project. Based on peak noise levels provided by the survey, reference noise levels with a uniform distance of 50 feet were calculated and are provided in Table XIII-1.

Table XIII-1: Construction Reference Noise Levels

Construction Stage	Reference Construction Equipmnet[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Composite Reference Noise Level (dBA L_{eq})[2]	Reference Power Level (dBA L_w)[3]
Grading/Site Preparation	Tractor	80	84.0	115.6
	Backhoe	74		
	Grader	81		
Pipeline Construction	Excavator	77	79.6	111.3
	Front End Loader	75		
	Welder/Torch	70		
Well Drilling	Drill Rig	85	87.6	119.2
	Generator	80		
	Compressor	82		

[1] FHWA Road Construction Noise Model.
[2] Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed project footprint is located in relatively low background noise environments.

Off-Site Traffic Noise Analysis

The project would typically generate a maximum of 4 trips per week for maintenance activities. Therefore, the Project would result in a less than 1 dBA change in traffic noise levels at land uses adjacent to the study area roadway segments, which would be as *less than significant* noise level increase in traffic noise levels.

Operational Noise Analysis

The proposed extraction well pump would be in an open structure with overhead protection. The proposed structure would not provide any noise reduction. The proposed extraction pumps are anticipated to generate up to 60 dBA at 32 feet. Assuming the extraction well is generally located near the center of the proposed well sites, the nearest receivers (R1) are approximately 700 feet from the proposed Well 18 location, and (R6) 200 feet from the anticipated Backup Well location. Based on the anticipated attenuation due to distance, extraction pump noise levels would be approximately 33 to 44 dBA Leq at the nearest off-site receivers. These noise levels would be below the County of San Bernardino daytime and nighttime noise level limits for residential land uses. Therefore, operational noise sources would be well controlled and are not anticipated to result in substantial noise level increases. Therefore, operational noise sources would be well controlled and are not anticipated to result in substantial noise level increases..

Construction Noise Analysis

Using the reference construction equipment noise levels and the CadnaA noise prediction model,

calculations of the Project construction noise levels with all equipment operating simultaneously during the daytime hours were completed. As shown in **Table XIII-2**, the unabated daytime construction noise levels for activities for drilling and pipeline activities at the Well 18 site are expected to range from 55.0 to 68.3 dBA Leq at the nearest residential uses.

Table XIII-2: Well 18 Daytime Construction Noise Level Summary

Receiver Location[1]	Well 18			
	Grading/Site Preparation	Pipeline Construction	Well Drilling	Highest Levels[2]
R1	64.7	60.3	68.3	68.3
R2	63.2	58.8	66.8	66.8
R3	59.4	55.0	63.0	63.0

[1] Construction noise source and receiver locations are shown in **Figure XIII-2.**
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix B of the NA.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project drilling noise levels during the nighttime hours were completed. As shown in **Table XIII-3**, the unabated nighttime construction noise levels for drilling activities are expected to range from 60.9 to 64.3 dBA Leq at the nearest residential uses.

Table XIII-3: Well 18 Nighttime Construction Noise Level Summary

Receiver Location[1]	Well 18			
	Grading/Site Preparation	Pipeline Construction	Well Drilling	Highest Levels[2]
R1	0.0	0.0	64.3	64.3
R2	0.0	0.0	64.1	64.1
R3	0.0	0.0	60.9	60.9

[1] Construction noise source and receiver locations are shown in **Figure XIII-2**.
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix B of the NA.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise levels with all equipment operating simultaneously during daytime hours were completed. As shown in **Table XIII-4**, the unabated construction noise levels for well drilling and pipeline activities at the Backup Well site are expected to range from 52.8 to 78.4 dBA Leq at the nearest residential uses.

Table XIII-4: Backup Well Daytime Construction Noise Level Summary

Receiver Location[1]	Well 18			
	Grading/Site Preparation	Pipeline Construction	Well Drilling	Highest Levels[2]
R4	58.5	54.1	62.1	62.1
R5	57.2	52.8	60.8	60.8
R6	74.8	70.4	78.4	78.4
R7	70.1	65.7	73.7	73.7
R8	60.9	56.5	64.5	64.5

[1] Construction noise source and receiver locations are shown in **Figure XIII-3.**
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix B of the NA.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project drilling activities were completed. As shown in **Table XIII-5,** the unabated construction noise levels for activities are expected to range from 56.9 to 76.3 dBA L_{eq} at the nearest residential uses.

Table XIII-5: Backup Well Nighttime Construction Noise Level Summary

Receiver Location[1]	Well 18			
	Grading/Site Preparation	Pipeline Construction	Well Drilling	Highest Levels[2]
R4	58.5	54.1	62.1	62.1
R5	57.2	52.8	60.8	60.8
R6	74.8	70.4	78.4	78.4
R7	70.1	65.7	73.7	73.7
R8	60.9	56.5	64.5	64.5

[1] Construction noise source and receiver locations are shown in **Figure XIII-3.**
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix B of the NA.

To evaluate whether the Project will generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts, and 70 dBA L_{eq} is used as a reasonable threshold to assess the nighttime construction noise level impacts. As shown in **Table XIII-6**, construction noise levels at the nearest receiver locations will satisfy the reasonable daytime 80 dBA L_{eq} significance threshold during Project construction activities at either site. However, **Table XIII-6** shows that the well drilling activities at the Backup Well site would exceed the nighttime noise level threshold at R6. Therefore, it is recommended that if the Backup Well site is chosen, the Project should incorporate a 16-foot-high barrier along the sound boundary of the Backup Well site, as shown in **Figure XIII-4**. Thus, the following mitigation measure shall be implemented to ensure that construction noise at the backup well is reduced to below significance thresholds at the nearest sensitive receptor.

NOI-1 ***If the District selects the Backup Well site for development of Well 18, a noise barrier with a minimum height of 16 feet shall be erected along the southern Backup Well site boundary as shown in Figure XIII-4. The District shall install an effective noise barrier; an effective barrier requires a weight of at least 2 pounds per square foot of face area with no decorative cutouts, perforations, or line-of-sight openings between shielded areas and the source. Examples of temporary barrier material includes 5/8-inch plywood, 5/8-inch oriented-strand board, or sound blankets capable of providing a minimum sound transmission loss (STC) of 27 or a Noise Reduction Coefficient (NRC) of 0.85.***

As shown in **Table XIII-7**, the recommended barrier would reduce drilling noise level below 70 dBA and would comply with the reasonable nighttime noise level threshold of 70 dBA L_{eq} at all receivers.

Table XIII-6: Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Highest Daytime Construction Noise Levels[2]	Daytime Threshold[3]	Threshold Daytime Exceeded?[4]	Highest Nighttime Construction Noise Levels[2]	Nighttime Threshold[3]	Threshold Daytime Exceeded?[4]
R1	68.3	80	No	64.3	70.0	No
R2	66.8	80	No	64.1	70.0	No
R3	63.0	80	No	60.9	70.0	No
R4	62.1	80	No	59.3	70.0	No
R5	60.8	80	No	59.9	70.0	No
R6	78.4	80	No	76.3	70.0	Yes
R7	73.7	80	No	68.6	70.0	No
R8	64.5	80	No	56.9	70.0	No

[1] Construction noise source and receiver locations are shown in **Figure XIII-2 and -3**.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations, as shown in **Tables XIII-2** through 5.
[3] Construction noise level thresholds based on FTA 2018.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?

Table XIII-7: Construction Noise Level Compliance with Mitigation at Backup Well Site

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Highest Daytime Construction Noise Levels[2]	Daytime Threshold[3]	Threshold Daytime Exceeded?[4]	Highest Nighttime Construction Noise Levels[2]	Nighttime Threshold[3]	Threshold Daytime Exceeded?[4]
R4	58.4	80	No	55.7	70.0	No
R5	56.9	80	No	56.3	70.0	No
R6	71.5	80	No	64.1	70.0	No
R7	69.8	80	No	63.9	70.0	No
R8	60.9	80	No	53.2	70.0	No

[1] Construction noise source and receiver locations are shown in **Figure XIII-2 and -3**
[2] Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations, as shown in **Table XIII-2 through XIII-5**.

[3] Construction noise level thresholds based on FTA 2018.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?

Therefore, through the implementation of the mitigation measure identified above, neither operation or construction of the proposed project would violate noise standards outlined in the San Bernardino County Development Code. Impacts under this issue are considered less than significant with mitigation incorporated.

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

The background vibration-velocity level in residential areas is generally 50 VdB; levels would generally be considered even less in rural areas such as the area surrounding the project footprint. Groundborne vibration is normally perceptible to humans at approximately 65 VdB, while 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible. Construction activity can result in varying degrees of groundborne vibration, but is generally associated with pile driving and rock blasting. Other construction equipment, such as air compressors, light trucks, hydraulic loaders, etc. generates little or no ground vibration. While no enforceable regulations for vibration exist within the County of San Bernardino, the Federal Transit Association (FTA) guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential project related vibration impacts. As shown in Table XIII-8, the use of vibration-generating construction equipment would generate vibration levels ranging from 0.003 to 0.089 in/sec PPV, or 58 to 94 VdB, at a distance of 25 feet. Table XIII-9 summarizes the minimum distances at which vibration generated by construction equipment would attenuate to less than significant levels at various receivers. CBP construction activities utilizing equipment at the minimum distances shown in Table XIII-9 would have a less than significant construction vibration impact.

Table XIII-8: Vibration Levels Measured During Construction Activities

Equipment	PPV at 25 feet (in/sec)	VdB at 25 feet
Large Bull Dozer	0.089	87
Small Bull Dozer	0.003	58
Drill Rig[1]	0.089	87
Loaded Truck	0.076	83
Vibratory Roller	0.21	94
Jackhammer	0.035	79

PPV = peak particle velocity; in/sec = inches per second; VdB = vibration decibels
[1] Vibration levels from caisson drilling were used as a proxy for drill rigs.
Source: FTA. 2018. *Transit Noise and Vibration Impact Assessment Manual.* https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed October 2021).

Table XIII-9: Vibration Level Contours During Construction Activities

Equipment	Minimum Distance to Receiving Land Use for a Less Than Significant Impact (feet)			
	Historic Sites[1]	All Other Structures[2]	Daytime Vibration-Sensitive Land Uses[3]	Nighttime Vibration-Sensitive Land Uses[4]
Large Bull Dozer	20	15	10	55
Small Bull Dozer	5	5	5	5
Loaded Truck	20	10	10	35
Drill Rig[5]	20	15	15	55
Vibratory Roller	40	30	25	110
Jackhammer	10	5	5	25

PPV = peak particle velocity in inches per second; VdB = vibration decibels
Note: Distances are rounded to the nearest 5 feet.
[1] Distance to the 0.12 in/sec PPV contour (FTA construction vibration damage criteria for buildings extremely susceptible to vibration damage, as shown in Table XIII-1).
[2] Distance to the 0.2 in/sec PPV contour (FTA construction vibration damage criteria for non-engineered timber and masonry buildings, as shown in Table XIII-1).
[3] Distance to the 0.24 in/sec PPV contour (the level at which vibration associated with transient vibration sources is distinctly perceptible, as shown in Table XIII-1).
[4] Distance to 80 VdB contour (the recommended threshold to evaluate human annoyance impacts at residences and buildings where people normally sleep).
[5] Caisson drilling was used as a proxy for drill rigs.

For well drilling activities, the proposed project would be installed outside of the minimum distances from historic and other structures, daytime vibration-sensitive land use, and nighttime vibration-sensitive land use, and as such, though well drilling activities generate relatively substantial vibration, given the distance between where the ground disturbance activities would be located, and the distance to the nearest sensitive receptor (greater than 100 feet from the well location within the project site at either the Well 18 or Backup Well site), it is not anticipated that vibration from either construction or operation activities would reach any nearby residences. The installation of pipeline may require the use of jackhammer, and ultimately may require large and small bull dozers, loaded trucks, and vibratory rollers to recompact and pave roadways where applicable. The pipeline will only be installed during the daytime. Given the 41 foot distance from nearby sensitive receptors and structures, the installation of pipelines would be located outside of the minimum distance to receiving land use for a less than significant impact for historic and other structures, daytime vibration-sensitive land uses, and as such, it is not anticipated that vibration from either construction or operation activities would reach any nearby residences. Therefore, any impacts under this issue are considered less than significant. No mitigation is required.

c. *No Impact* – The proposed well development sites are not located within an airport land use plan, within two miles of a public airport or private airstrip. According the San Bernardino Countywide Plan the closest public airport to the project site is the Southern California Logistics Airport, which is located approximately 11 miles to the northeast of the project site. The nearest private airports are Gray Butte Field, Krey Field, and Brian Ranch Airports are all located more than 5 miles from the project area. Due to the distance from these private airports, as well as the distance from the Southern California Logistics Airport, the project would have no potential to expose people residing or working in the project area to excessive noise levels generated by nearby aircraft or airport operations. No impacts are anticipated and no mitigation is required.

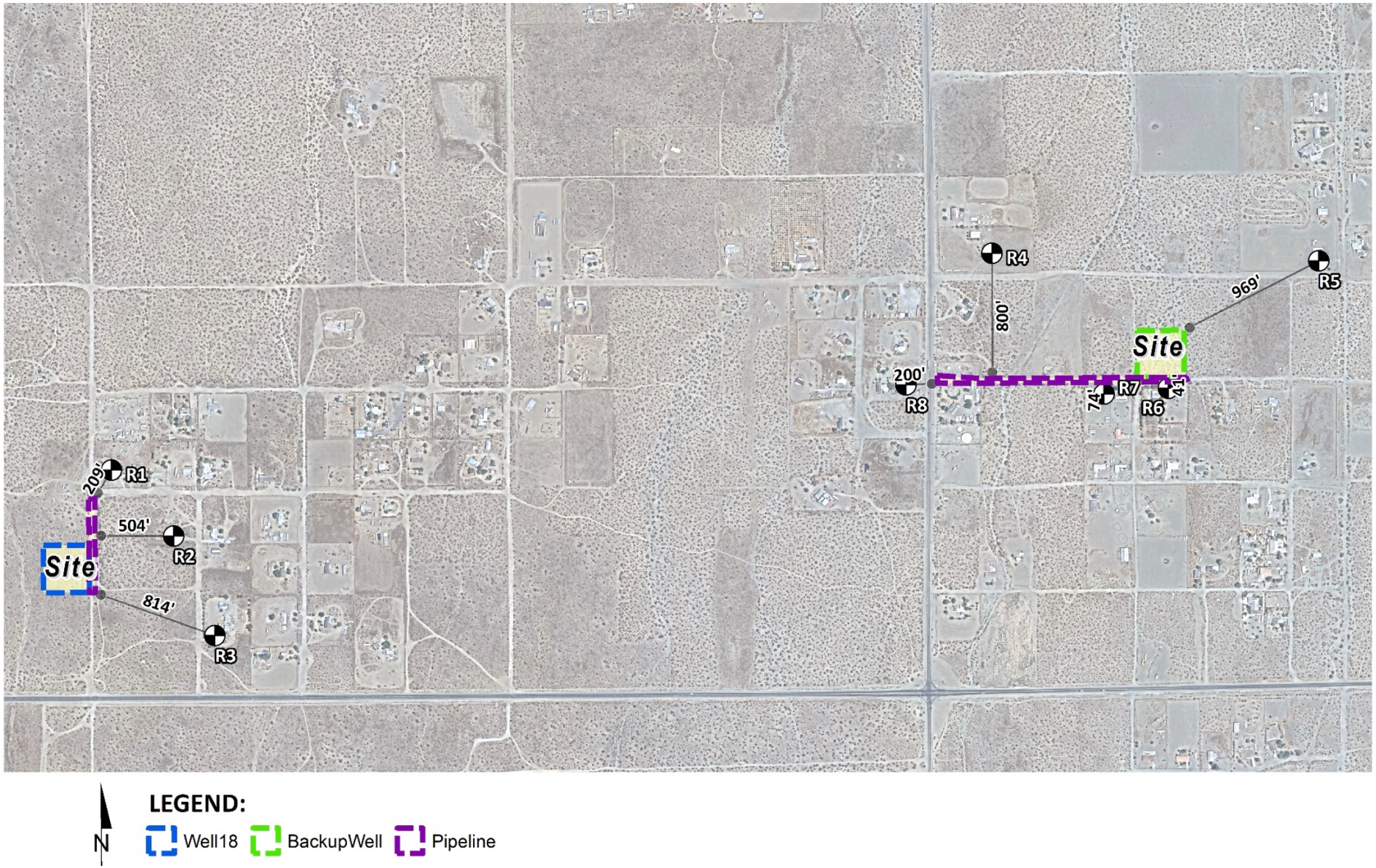

FIGURE XIII-1

Tom Dodson & Associates
Environmental Consultants

Sensitive Receptor Map

FIGURE XIII-2

Tom Dodson & Associates
Environmental Consultants

Well 18 Construction Noise Sources and Receivers

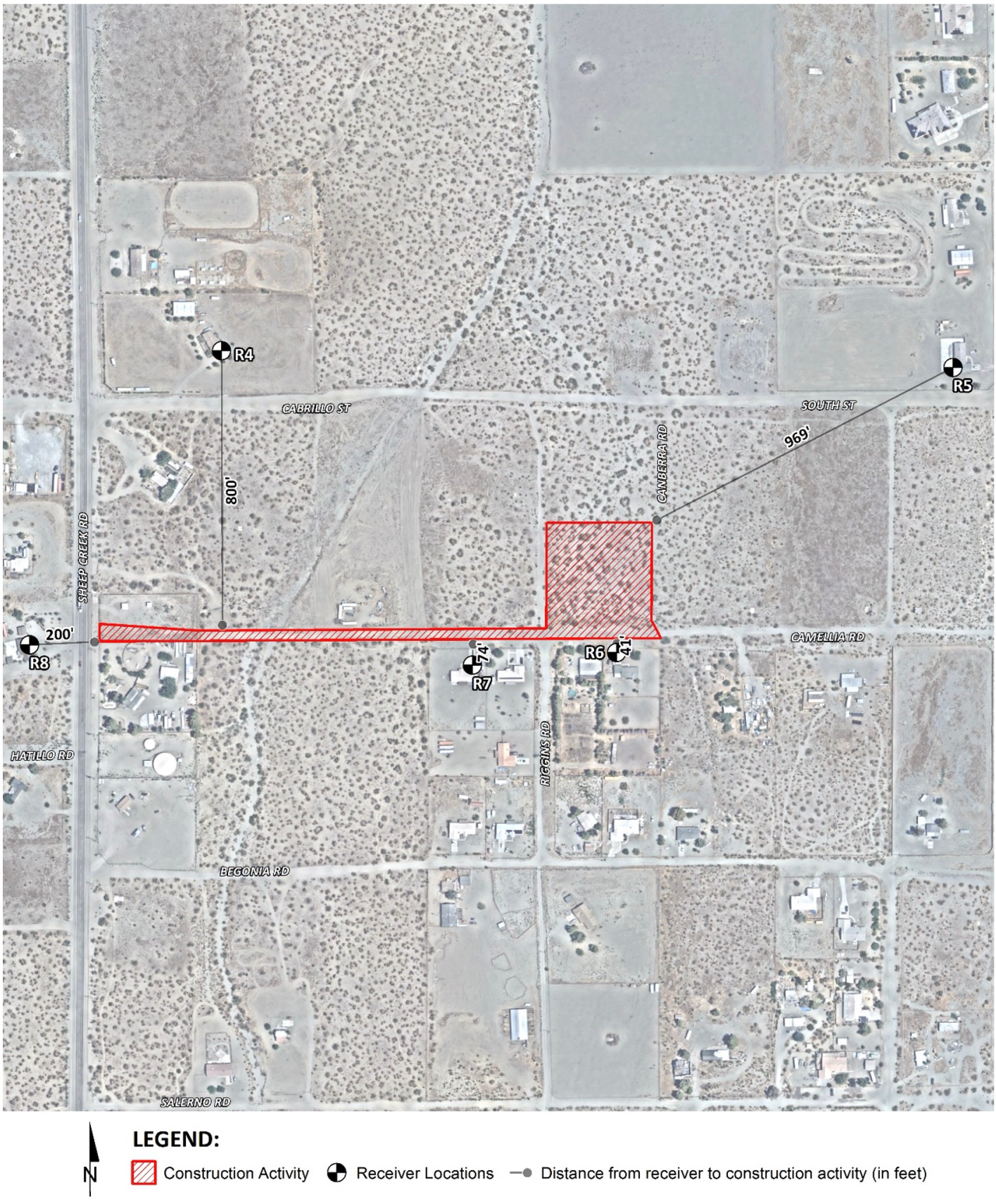

FIGURE XIII-3

Tom Dodson & Associates
Environmental Consultants

Backup Well Construction Noise Sources and Receivers

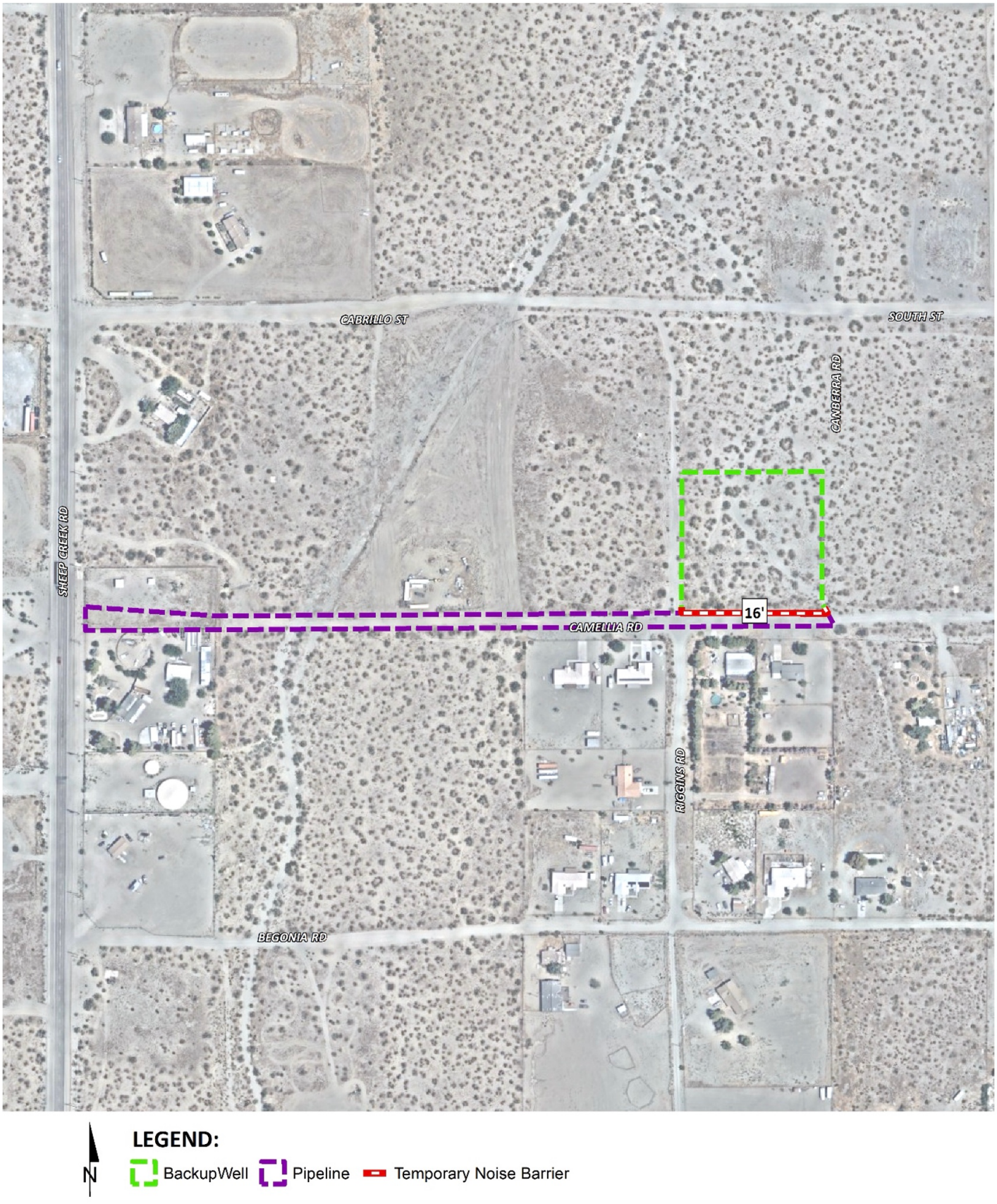

FIGURE XIII-4

Tom Dodson & Associates
Environmental Consultants

Recommended Barrier Location for Backup Well Site

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* -- Implementation of the Project would not result in the loss of availability of any known mineral resources that would be of value to the region and the residents of the state. According to the Geologic Map of the San Bernardino Quadrangle from the California Department of Conservation, the project sites are located on alluvial soils. Alluvial soils are not a unique soil classification in the project vicinity, as well as in southern California. In addition, neither the project sites nor surrounding vicinity have been mined in the past. If mineral resources were present on the project sites, then there would have been historic operations on the project sites to commercially extract these resources. Based on this information, any impacts to mineral resources from implementing the Project would be considered less than significant. No mitigation is required.

b. *No Impact* – Please reference response XII(a) above. While the San Bernardino Countywide Plan does contain Goals and Policies that related to mineral resources (Goal NR-6.1, NR-6.2, and NR-6.3 of the San Bernardino County General Plan), the project sites have not been historically mined for important mineral resources, and are not located on the Countywide Plan Mineral Resource Zone Map (**Figure XII-1**). No specific plan or other land use plan is in place that would delineate important mineral resources on the project site. Based on this information, no impacts to mineral resources from implementing the project are anticipated. No mitigation is required.

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

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The San Bernardino County Fire Department (SBCFD) provides fire protection and emergency medical services for the Communities of Phelan. The nearest fire station to the proposed project is San Bernardino County Fire Station #10 and is located approximately about 7 miles south of the proposed project footprint at the address 9625 Beekley Rd, Phelan, CA 92371. Additionally, San Bernardino County Fire Station #322 is located at 10370 Ranco Road, Adelanto, CA 92301. The proposed project may require the use of chemicals such as sodium hypochlorite at the well site. Proper storage and handling are required to prevent any potential fire hazards; however, compliance with Federal, State, and local standards pertaining to hazardous materials would prevent a significant impact from occurring. The proposed project would develop a well that would connect to the existing PPHCSD water distribution system. The only possible structure proposed—a structure to enclose the sodium hypochlorite the well site and a shaded structure for the well at the well site—would not present a substantial fire hazard because the materials used to construct the enclosure are considered fire-resistant. Thus, with compliance to Federal, State, and local standards, no new or altered fire protection facilities would be required to serve this project. Any impact to the existing fire protection system is considered random and less than significant. No mitigation is required.

b. *Less Than Significant Impact* – The Community of Phelan receives police services through the San Bernardino County Sheriff Department. The Department enforces local, state, and federal laws; performs investigations and makes arrests; administers emergency medical treatment; and responds to County emergencies. The sheriff station is located at 4050 Phelan Road, Phelan, CA 92371, about 7 miles south of the proposed project footprint. The proposed project would not include the kind

of uses or activities that would likely attract criminal activity, except for random trespass and theft; however, any random trespass is unlikely because the project site would remain fenced off from public access. The proposed well would not be readily accessible to the public as the well would be fenced to prevent public access at the well. This would minimize the potential for any trespass from occurring during both operations and construction of the project. The potential for greater demand of police protection services or expansion of police infrastructure as a result of implementation of the proposed project is therefore considered less than significant. No mitigation is required.

c. *No Impact* – The proposed project is located within the area served by the Snowline Joint Unified School District. The nearest schools are located about 7 miles to the south of the proposed project footprint around the Sheep Creek Road and Phelan Road corridor. The project would not induce population growth within the District's service area, as operation of the proposed well is not anticipated to require PPHCSD to hire additional personnel, and furthermore, is needed to address the growing demand for water within the District's service area. Thus, the proposed project would not generate an increase in elementary, middle, or high school population. Therefore, no adverse impacts are anticipated under this issue and no mitigation is required.

d. *No Impact* – As stated in the preceding sections, the proposed project is not anticipated to create an increase in population because the operation of the proposed well would not require any additional District personnel once the proposed well has been installed. There are no parks within the well development sites or in the vicinity of the project that would be impacted by the proposed well development project, and with no forecast increase in population attributable to the proposed project, implementation of the proposed project would not cause a substantial adverse physical impact to any parks within the District's service area. No impacts are anticipated and no mitigation is required.

e. *No Impact* – Other public facilities include library and general municipal services. Since the project would not directly induce population growth, it is not forecast that the use of such services would increase as a result of the proposed project. No impacts under this issue are anticipated, and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *No Impact* – As previously discussed in Section XIV, Population and Housing and Section XV, Public Services, this project would not contribute to an increase in the population beyond that already allowed or planned for by local and regional planning documents. The proposed project would not increase the use of recreational facilities, nor would it result in the physical deterioration of other surrounding facilities. No impact is forecast and no mitigation is required.

b. *No Impact* – The proposed project would develop a well to serve the District's service area and would ultimately connect to the District's existing water distribution system through connecting pipeline, as well as on site piping. The well would be installed and operated by the District. The project does not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. As previously stated, the proposed project would occur within one of two vacant sites, neither of which have been designated for recreational use nor contain recreational uses at present. Furthermore, the proposed project is not forecast to induce substantial population growth as the well would operate without daily in-person supervision; visits would occur by District employees on an as needed or scheduled maintenance basis. Therefore, no impacts are anticipated to occur under this issue, and no mitigation is required.

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

SUBSTANTIATION:

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed well development project is located within the community of Phelan within San Bernardino County. Construction of the well would be limited to within the boundaries of the selected project well site, though the well would require a connection to the District's existing potable water distribution system. Either well would require a short period of construction within the corresponding roadways adjacent to the project site, with a maximum of 1,800 LF of pipeline to connect to the District's system depending on the site that is selected. The roadways within which construction would occur are Beekley Road for the Well 18 site, and Camellia Road for the Backup Well site. In the short term, construction of each proposed well and pipeline would result in the generation of an average of about 10-15 additional roundtrips per day on the adjacent roadways by construction personnel and the removal of any graded material and delivery of well construction materials. No new roads are required to construct or operate this project. However, construction within existing roadways is necessary to complete construction of the connecting pipeline would occur over a period of 25 days. No temporary roadway closure would be required though one lane may require closure at any given time throughout construction; given the temporary nature of the construction proposed within Beekley Road or Camellia Road, the proposed project is not anticipated to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. However, the proposed project shall implement the following mitigation measure to ensure that disturbances within public roadways would be repaired to at existing or better conditions.

TRAN-1 ***The construction contractor would provide adequate traffic management resources, as determined by the District. The District shall require a construction traffic management plan for work in public roads that complies with the Work Area Traffic Control Handbook, or other applicable standard, to provide adequate traffic control and safety during excavation activities. The traffic management plan shall be prepared***

and approved by the District prior to initiation of excavation or pipeline construction. At a minimum this plan shall include how to minimize the amount of time spent on construction activities; how to minimize disruption of vehicle and alternative modes of transport traffic at all times, but particularly during periods of high traffic volumes; how to maintain safe traffic flow on local streets affected by construction at all times, including through the use of adequate signage, protective devices, flag persons or police assistance to ensure that traffic can flow adequately during construction; the identification of alternative routes that can meet the traffic flow requirements of a specific area, including communication (signs, webpages, etc.) with drivers and neighborhoods where construction activities would occur; and at the end of each construction day roadways shall be prepared for continued utilization without any significant roadway hazards remaining.

TRAN-2 The District shall require that all disturbances to public roadways be repaired in a manner that complies with the Standard Specifications for Public Works Construction (green book) or other applicable County of San Bernardino standard design requirements.

The operation phase of the proposed project would require minimal new trips to the well development site on a maintenance basis only, and given that the project sites are located within about 7 miles of the District's Offices, the traffic on adjacent roadways as a result of well operations would be minimal. As such, operation of the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, with implementation of the above mitigation measures, implementation of the project would have a less than significant impact under this issue.

b. *Less Than Significant Impact* – The proposed project would install a new well and connecting pipelines within either Beekley Road or Camellia Road. A VMT calculation is typically conducted on a daily or annual basis, for long-range planning purposes. As discussed under Response (a) above, construction vehicles on local roadways would be temporarily increased during project construction due to the presence of construction vehicles and equipment. Increases in VMT from construction would be short-term, minimal, and temporary. The duration of the potential significant impacts would be limited to the period of time needed to construct individual projects. As such, VMT standards, which are intended to monitor and address long-term transportation impacts resulting from future development, do not apply to temporary impacts associated with construction activities. Therefore, no construction impact associated with VMT per CEQA Guidelines Section 15064.3 would occur.

The proposed project would not cause substantial long-term/ongoing transportation effects, because proposed project facilities, once constructed, would only require maintenance activities similar to those that occur under existing conditions and no increase in employees due to the implementation of the proposed project is forecast to occur. The Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) states, "Projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant VMT impact." Scheduled maintenance visits would also occur in the future with one trip per maintenance event, with occasional trips also occurring when unforeseen circumstances arise that would require maintenance or repair of certain facilities. As such, the proposed project would

generate less than 110 trips per day, which is the recommended screening threshold. Therefore, the proposed project would not result in a substantial addition of VMT per service population or induce additional roadway vehicle travel by increasing physical roadway capacity or adding new roadways to the network. Therefore, no operational impact associated with VMT per CEQA Guidelines Section 15064.3 would occur.

Thus, development of the District's Well No. 18 Development Project is not anticipated to result in significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts under this issue are considered less than significant.

c. *Less Than Significant With Mitigation Incorporated* – The proposed project would not substantially increase hazards due to a design feature or incompatible uses. The construction of the well and supporting pipeline would occur at one of two locations and within roadways within the District's service area. With the exception of the aforementioned trip generation during the construction phase and the installation of the connection pipeline from the well to the District's distribution system, the proposed project would not alter any adjacent roadways. The construction within the adjacent roadway to either well site would be limited to approximately 25 days. Neither of the roadways that could be impacted by pipeline installation are heavily traveled, as the roadways serve a rural community and are local serving roadways. As stated under issue XVII(a) above, the with the implementation of mitigation measures **TRAN-1** and **TRAN-2** above, which require implementation of a construction traffic management plan, any potential increase in hazards due to design features or incompatible use would be considered less than significant in the short term. In the long term, no impacts to any roadway hazards or incompatible uses in existing roadways are anticipated because once the pipeline is installed, the roadway would be returned to its original condition. Thus, any potential increase in hazards due to design features or incompatible use would be considered less than significant. No mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – Please refer to the discussion under issue XVII(a) above. The proposed project may require closure of one lane within the roadway in which the well connection pipeline is installed. This effort would occur within either Beekley Road or Camellia Road. During construction, a potential exists for short-term hazards and constraints on both normal and emergency access within the affected area, especially due to the construction of each connection pipeline, as it would require partial lane closure within existing rights-of-way. There are no emergency access roadways located within the project footprint. However, adequate emergency access would be provided along the pipeline routes throughout construction. Though closure of one lane would impact traffic, the implementation of mitigation measures **TRAN-1** and **TRAN-2** would ensure that impacts are reduced to a level of less than significant. No additional mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographic-ally defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in sub-division (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

SUBSTANTIATION: Please refer to the discussion under Section V, Cultural Resources.

Impact Analysis

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

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

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – PPHCSD has been contacted by two Tribes under Assembly Bill (AB) 52: the Yuhaaviatam of San Manuel Nation (YSMN), and the Morongo Band of Mission Indians. The tribes were contacted to initiate the AB-52 process on January 31, 2025 to notify the tribes of the proposed project through mailed letters. During the 30-day consultation period, no response was received from the Morongo Band of Mission Indians; however, the Yuhaaviatam of San Manuel Nation (YSMN) has requested consultation on the project. Based on the lack of known tribal cultural resources sensitivity in this area, the Tribe (YSMN) has simply requested the following language be included to ensure proper treatment of tribal cultural resources in the event of inadvertent discoveries, in addition to the incorporation of **MMs CUL-2** through **CUL-4** intended to further minimize impacts to tribal cultural resources:

TCR-1 ***The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in MM CUL-2, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.***

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

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

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

SUBSTANTIATION

Impact Analysis

a. Water

Less Than Significant Impact – The proposed project is a well development project within the PPHCSD service area. As discussed in the preceding sections, the development of the proposed well would not have a significant impact on the environment. As discussed under Hydrology and Water Quality issue X(b), the proposed well would extract groundwater from the Upper Mojave River Valley Groundwater Basin. The amount of water the District plans to extract from the Basin is minimal compared to the overall amount of water extracted the Groundwater Basin. Payment of fees to MWA would ensure that impacts related to water supply are minimized. As such, though the project would install a well that would connect to District's existing service area should it be viable, the project would not result in a significant impact. Therefore, impacts under this issue are considered less than significant.

Wastewater

No Impact – The proposed project would install a well and connecting pipeline to connect to the District's existing potable water distribution system. The well development is not anticipated to require expansion or development of new wastewater treatment facilities. This project would not require connection to wastewater treatment collection services once in operation. As such, this project is not anticipated to require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. No impacts under this issue are anticipated.

Stormwater

Less Than Significant Impact – The proposed project would manage stormwater at the well site. The proposed project sites vary from disturbed compacted dirt to containing native and non-native vegetation, as such, once the well is installed, the drainage pattern of the area of disturbance would not change substantially. The well site would require minimal grading and site clearing in the small areas in which the well would be installed, and as such would have a less than significant potential to interfere with the discharge of stormwater over the long-term as the site would remain essentially the same, with only the small area that would be disturbed as a result of the well development. Adequate drainage facilities exist or would be developed by this project to accommodate future onsite drainage flows. The well would occupy a minimal portion of either of the proposed well sites, and as such, the project is not anticipated to result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Impacts under this issue are considered less than significant.

Electric Power

Less Than Significant Impact – The proposed project would install a well. The new well and connection pipeline would require electricity to operate the new well's pump. The project area is served by Southern California Edison (SCE), and is not anticipated to require extension of electricity in order to operate as the site is currently connected to the electrical system with available supply of electricity at the site. The project would install internal electricity to support project development. Given that the project would not require additional construction or relocation of electrical power facilities, and that the project is not anticipated to result in a significant impact under any issue, the proposed project would have no potential to require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects. No impacts are anticipated under this issue.

Natural Gas

No Impact – Development of the new PPHCSD well would not demand natural gas. Therefore, the project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. No impacts are anticipated.

Telecommunications

No Impact – Development of the new PPHCSD well would not require installation of wireless internet service or phone serve. Therefore, the project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunication facilities. No impacts are anticipated.

b. *Less Than Significant Impact* – Please refer to issue X(b), Hydrology and Water Quality, above. The proposed project would develop a well to supply water to the District's service area. The proposed well would extract groundwater from the Upper Mojave River Valley Groundwater Basin. The proposed well would pump from the Oeste Subarea of the MBA. As a Producer utilizing groundwater within the adjudicated MBA, the District is subject to the MBA Judgement, and as such, if it exceeds the allotted Free Production Allowance, the Producer must pay the Mojave Water Agency (MWA)—the Watermaster of the MBA—a Replacement Water Assessment. The Groundwater Basin has several sub-basins that experienced overdraft (total water use was greater than the supply) in recent years, however, for the Oeste sub-basin, in recent years, water supply has been roughly equal or somewhat below verified production. The Mojave Basin Area (MBA) Watermaster Oeste Subarea Water Supply Update (2024) recommended basing physical safe yield (PSY) on the most recent years of pumping, the five year average of 3,634 acre feet.[9] The proposed new well is forecast to increase groundwater extraction by about 600 AFY, the proposed project would ensure that the required supply would be replaced to ensure that impacts to the MBA would be less than significant. Based on this information, it is anticipated that there would be available water supply within the MBA to support the District's new well pumping operations. Therefore, the proposed project is anticipated to have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Impacts under this issue are less than significant. No mitigation is required.

c. *No Impact* – Please refer to the discussion under XIX(a) above. The well operation would not require installation of restroom facilities; construction would require portable toilets that would be handled by the provider of such facilities. As such, given that the well operation would not require any new connection to wastewater treatment services, it is not anticipated that the project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No impacts under this issue are anticipated.

d&e. *Less Than Significant Impact* – The proposed Project is not anticipated to generate a large amount of waste as a result of construction or operation of the new well. Any construction and demolition (C&D) waste will be recycled to the maximum extent feasible and any residual materials will be delivered to one of several C&D disposal sites in the area surrounding the project site. Many of these C&D materials can be reused or recycled, thus prolonging the supply of natural resources and potentially saving money in the process.

In accordance with CALGreen Code 5.408.4, 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing must be reused or recycled. As this is a mandatory requirement, no mitigation is required to ensure compliance by the District for this proposed project.

Demolition is not anticipated to be required as part of the proposed project, construction waste reduction/diversion would be the focus of recycling/reuse. Because of increased construction recycling efforts resulting from CalGreen and other regulations, opportunities for construction recycling are becoming easier to find, as evidenced by the number of facilities listed on the San

[9] Mojave Basin Area Watermaster, 2024. Oeste Subarea Water Supply Update. https://www.mojavewater.org/wp-content/uploads/2024/02/Appendix-C-Oeste.pdf (Accessed 04/03/25)

Bernardino County Construction & Demolition Waste Recycling Guide.[10] These facilities accept materials such as: appliances, cardboard, metals, wood, asphalt, concrete, soil, block rock, brick, carpet and padding, concrete with rebar, drywall, gravel, rock, roof tile, and tile.

The facilities that accept C&D materials, combined with the landfills in the surrounding area, have adequate capacity to serve the proposed project. Solid waste will be disposed of in accordance with existing regulations at an existing licensed landfill. Solid waste will be disposed of in accordance with existing regulations at an existing licensed landfill—such as the Victorville Sanitary Landfill — with adequate capacity to handle the waste. According to the CalRecycle and San Bernardino County Solid Waste Management—which serves the community of Phelan—the maximum permitted capacity of Victorville Sanitary Landfill is 93,400,000 Cubic Yards (CY), while its remaining capacity is 79,400,000 CY; the Victorville Sanitary Landfill can accept 3,000 tons per day.[11] Thus, there is adequate solid waste disposal capacity for solid waste generated as a result of implementation of the proposed project both in the short term and long term. As such, the proposed project would comply with all federal, State, and local statues related to solid waste disposal.

Any hazardous materials collected on the project site during either construction or operation of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Therefore, the proposed project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. As a result, the proposed project is expected to comply with all regulations related to solid waste under federal, state, and local statutes and be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. No mitigation is necessary.

[10] San Bernardino County, 2021. Construction & Demolition Waste Recycling Guide https://www.sbcounty.gov/uploads/DPW/docs/RecyclingGuide-2021.pdf (accessed 04/03/25)
[11] CalRecycle, 2025. SWIS Facility Victorville Sanitary Landfill. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652 (accessed 04/03/25)

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

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed project is not located in a wildland fire hazard area, as according to Section 8 – Safety of the Phelan/Piñon Hills Community Plan (p.54), fire hazard severity is very high only in limited areas, south of Highway 138. The CalFire Fire Hazard Severity Zone Viewer Map (**Figure IX-3**), indicates that the proposed project is not located within a very high fire hazard severity zone and the proposed project is in fact located wither within a moderate fire hazard severity zone. However, the proposed project is located within a State Responsibility Area (SRA)(**Figure XX-1**). Please review the discussion of wildfire under Subchapter IX, Hazards and Hazardous Materials. There is limited vegetation in the vicinity of the project site that would pose a wildfire risk, particularly given that the area around the proposed well would be cleared of all vegetation. The proposed project does not include the use of flammable or explosive materials beyond the contained chemicals, such as sodium hypochlorite, which is required to chlorinate the water extracted at Well No. 18. This substance is considered a potentially hazardous substance. The District would comply with State standards. Furthermore, the District has developed safety standards and operational procedures for safe transport and use of its operational and maintenance materials that are potentially hazardous. These procedures would comply with all federal, state and local regulations would ensure that the project operates in a manner that poses no substantial hazards, including fire hazards, to the public or the environment.

During construction, because the proposed project is not located within high or very high Fire

Hazard Severity Zone in an SRA, construction is not anticipated to exacerbate fire risk. Standard construction practices, in addition to the project's located within a moderate fire hazard zone, would ensure that fire risk during construction is minimized.

Please refer to the discussion under Subsection XVII(d), Transportation. The roadways within which construction would occur are Beekley Road for the Well 18 site, and Camellia Road for the Backup Well site. In the short term, construction of each proposed well and pipeline would result in the generation of an average of about 10-15 additional roundtrips per day on the adjacent roadways by construction personnel and the removal of any graded material and delivery of well construction materials. No new roads are required to construct or operate this project. However, construction within existing roadways is necessary to complete construction of the connecting pipeline would occur over a period of 25 days. No temporary roadway closure would be required though one lane may require closure at any given time throughout construction; given the temporary nature of the construction proposed within Beekley Road or Camellia Road, the proposed project is not anticipated to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. However, the proposed project shall implement the following mitigation measure to ensure that disturbances within public roadways would be repaired to at existing or better conditions. Mitigation measures **TRAN-1** and **TRAN-2**, which require implementation of a construction traffic management plan, would ensure a less than significant potential for the proposed project will not substantially impair an adopted emergency response plan or emergency evacuation plan.in the short term. In the long term, no impacts to emergency response plans i are anticipated because once the pipeline is installed, the roadway would be returned to its original condition. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

b. *Less Than Significant Impact* – The proposed project includes the development of a new well within one of two vacant sites. The proposed project does not propose any human occupancy structures or other structures that will place people on the project site for long periods of time or pose a significant threat to people or property from wildfire risk. The site is located in an area containing native desert vegetation, of a type that would not present substantial fire risk due to the low profile of the vegetation. Because the proposed project would develop a well, and because the provision of water storage is considered a benefit to the prevention of the spreading of wildfire in high risk areas, it is not anticipated that development at this site would expose occupants to pollutant concentrations from a wildfire. Therefore, given that the proposed project does not contain any human occupancy structures, it is not anticipated that the project would exacerbate fire risks thereby exposing project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire. Impacts under this issue are considered less than significant and no mitigation is required.

c. *Less Than Significant Impact* – The proposed project would develop a well at one of two proposed vacant site locations. The sites contain vegetation that is sparse and low to the ground, characteristic of the, which is not anticipated to exacerbate fire risk during construction at this site located within a moderate Fire Hazard Severity Zone in an SRA. The proposed project does not include any new uses that would have a potential to result in random fire risk under accidental circumstances. Further, However, during construction, because the proposed project is not located within high or very high Fire Hazard Severity Zone in an SRA, construction is not anticipated to exacerbate fire risk. Standard construction practices, in addition to the project's located within a moderate fire hazard zone, would ensure that fire risk during construction is minimized. The proposed project would not result in any

ongoing impacts to the environment that would exacerbate fire risk as the proposed project would be operated in compliance with the District's HMBP, and further much of the project would be located belowground. Therefore, the proposed project would have a less than significant potential to exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d. *Less Than Significant Impact* – The proposed project would be installed on a site that would not require soil import or export to ensure that the well is installed on a flat surface. The design of the project site (**Figure 4**) would ensure that future drainage conditions are controlled within the site. The development of the well at either site will provide new drainage management to collect any sheet flow and convey it safely through the project site. The proposed project would construct recommended design measures, and as the sites are both relatively flat, the potential for landslides as a result of post-fire slope instability are nil. Furthermore, the project does not propose any habitable structures and thus the exposure of persons to such an event is minimal. As stated under the Hydrology Subchapter, flood risks at the project site are minimal, and therefore downslope flooding is not anticipated to occur as a result of post-fire slope instability or drainage changes. Based on the discussion above, the proposed project would have a less than significant potential to 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.

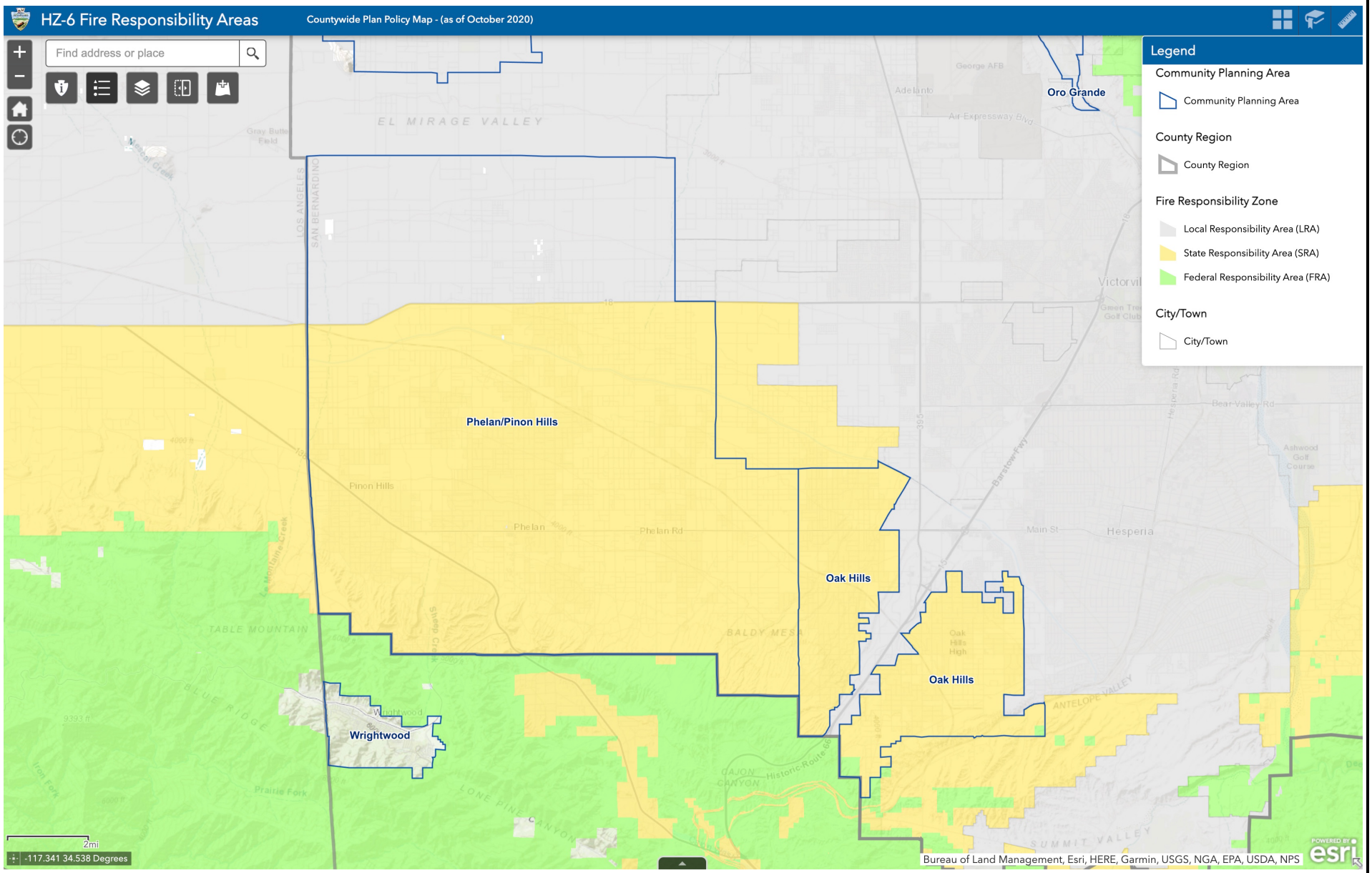

FIGURE XX-1

Tom Dodson & Associates
Environmental Consultants

Fire Responsbility Areas

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

SUBSTANTIATION

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

a. *Less Than Significant With Mitigation Incorporated* – The project has no potential to cause a significant impact any biological or cultural resources. The project has been identified as having no potential—with the implementation of mitigation measures—to degrade the quality of the natural environment, substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project well sites are each vacant. Though the sites contain vegetation, no sensitive natural biological habitat exists within the project sites; however, mitigation is required to protect nesting birds and burrowing owl, and if the Backup Well site is selected, to protect jurisdictional features and western Joshua tree. The cultural resources evaluation concluded that the project footprint does not contain archaeological or historic resources, and as such, no impacts are anticipated. To ensure that any accidentally exposed subsurface cultural resources are properly handled, contingency mitigation measures would be implemented, inclusive of those intended to protect tribal cultural resources that

were developed for implementation during project construction by YSMN. With incorporation of project mitigation measures all biology and cultural resource impacts would be reduced to a less than significant level.

b. *Less Than Significant Impact With Mitigation Incorporated* – The project has eleven (11) potential impacts that are individually limited, but may be cumulatively considerable. The issues of Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation, Tribal Cultural Resources, and Wildfire require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. The project is not considered growth-inducing as defined by *State CEQA Guidelines*, as it would not result in any new residents either directly, through the creation of housing, or indirectly, through the creation of jobs. The above issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects from the proposed project are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, the project's contribution to significant cumulative impacts would be less than significant.

c. *Less Than Significant With Mitigation Incorporated* – The project would achieve long-term community goals by providing reliable potable water from the new well. The short-term impacts associated with the project, which are mainly construction-related impacts, are less than significant with mitigation, and the proposed project is compatible with long-term environmental protection. The issues of Air Quality, Geology and Soils, Hazards and Hazardous Materials, Noise, and Wildfire require the implementation of mitigation measures to reduce human impacts to a less than significant level. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

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

Based on the findings in this Initial Study, the Phelan Piñon Hills Community Service District proposes to adopt a Mitigated Negative Declaration (MND) for the Phelan Piñon Hills Community Service District Well No. 18 Project. A Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) would be issued for this project by the County. The Initial Study and NOI would be circulated for 30 days of public comment.

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

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

SUMMARY OF MITIGATION MEASURES

Aesthetics

AES-1 The proposed structures shall be painted in colors that closely match the surrounding desert landscape, so as to create continuity in the potentially obscured views.

AES-2 A facilities lighting plan shall be prepared and shall demonstrate that glare from construction operations and safety night lights that may create light and glare affecting adjacent occupied property are sufficiently shielded to prevent light and glare from spilling into occupied structures. This plan shall specifically verity that the lighting doesn't exceed 1.0 lumen at the nearest residence to any lighting site within the project footprint. This plan shall be implemented by the District to minimize light or glare intrusion onto adjacent properties.

Air Quality

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

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

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

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

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

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

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

Biological Resources

BIO-1 Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys shall be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW prior to commencing Project activities.

BIO-2 If the Backup Well site is selected, a formal western Joshua tree census shall be conducted to catalog the trees. Further, an Incidental Take Permit shall be prepared and processed with CDFW for potential indirect impacts to western Joshua tree. If implementation of the proposed project should result in impacts to, or removal of any of the western Joshua trees occurring onsite, payment for mitigation shall be made into the western Joshua tree mitigation fund.

BIO-3 If the Backup Well site is selected, the District shall minimize discharge of fill to the extent feasible, and any discharge of fill not avoidable shall be mitigated through compensatory mitigation. Mitigation can be provided by restoration of temporary impacts, enhancement of existing resources, or purchasing into any authorized mitigation bank or in-lieu fee program; by selecting a site of comparable acreage near the site and enhancing it with a native riparian habitat or invasive species removal in accordance with a habitat mitigation plan approved by regulatory agencies; or by acquiring sufficient compensating habitat to meet regulatory agency requirements. Impacts to jurisdictional waters shall be mitigated at a minimum 1:1 ratio, with the ultimate compensatory mitigation ratio being determined through negotiation with regulatory agency, and never at a rate of less than 1:1. The ratio will rise based on the type of habitat, habitat quality, and presence of sensitive or listed plants or animals in the affected area. This increase in ratio will be determined by the regulatory agency, and must be deemed sufficient by the regulatory agency issuing the permit to compensate for/offset the impacts to the jurisdictional waters and supported species and habitats therein. A Habitat Mitigation and Monitoring Proposal shall be prepared by a biologist or regulatory specialist and reviewed and approved by the appropriate regulatory agencies. These agencies (Corps, Regional Board, CDFW and any other applicable regulatory agency with jurisdiction over the proposed facility improvement) can impose greater mitigation requirements in their permits, but the District will

utilize the ratios outlined above as the minimum required to offset or compensate for impacts to jurisdictional waters, riparian areas or other wetlands.

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

Cultural Resources

CUL-1 Should any cultural resources be encountered during construction of the well and associated pipelines, any earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the District's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures to be implemented within the guidelines of the California Environmental Quality Act to reduce impacts to discovered resources to a less than significant level.

CUL-2 In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within MM TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

CUL-3 If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and

Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within MM TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

CUL-4 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

Geology and Soils

GEO-1 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of the material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup.

GEO-2 Excavated areas shall be properly backfilled and compacted. Paved areas disturbed by this project would be repaved in such a manner that pipeline connections within adjacent roadways and other disturbed areas are returned to as near the pre-project condition as is feasible.

GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) would be sprayed with water or soil binders twice a day or more frequently if fugitive dust is observed migrating from either of the well sites within which the water facilities are being installed.

GEO-4 The length of trench which can be left open at any given time would be limited to that needed to reasonably perform construction activities. This would serve to reduce the amount of backfill stored onsite at any given time.

GEO-5 The District shall identify any additional BMPs to ensure that the discharge of surface water does not cause erosion downstream of the discharge point. This shall be accomplished by reducing the energy of any site discharge through an artificial energy dissipater or equivalent device. If any substantial erosion or sedimentation occurs, any erosion or sedimentation damage shall be restored to pre-discharge conditions.

GEO-6 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the District's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

Hazards and Hazardous Materials

HAZ-1 All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with

applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste would be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

Hydrology and Water Quality

HYD-1 The District shall test the groundwater produced from the well prior to discharge. Prior to or during discharge any contaminants shall be blended below the pertinent MCL or treated, including sediment or other material.

HYD-2 The District shall prepare a Drilling Plan that describes the drilling method and construction contingencies to be employed. That plan shall describe waste management control and disposal methods for cuttings, mud, and development water discharges. The Drilling Plan should identify, and illustrate on appropriate scale maps, the Best Management Practices (BMPs) that would be employed to ensure there are no adverse effects on ground or surface water quality; these BMPs shall ensure that the well purge, development water, and pipeline hydrostatic testing discharges not discharge to a stream channel or tributary of a water of the United States, including discharges to land, under requirements specified in General Board Order No. 2003-0003-DWQ. The District shall indicate how they would implement and monitoring the effectiveness of installed BMPs, and make necessary adjustments in the field if necessary to modify those BMPs and protect water quality. The Drilling Plan shall be made available to the Lahonton Regional Water Quality Control Board for their records.

HYD-3 The District shall require that the construction contractor to implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the District include the following:

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

HYD-4 The District shall conduct a pump test of the new well and determine whether any other wells are located within the cone of depression once the well reaches equilibrium. If any private wells

are adversely impacted by future groundwater extractions from the proposed well, the District shall offset this impact through provision of water service; or adjusting the flow rates or hours of operation to mitigate adverse impacts.

HYD-5 The District and construction contractor shall select best management practices applicable to the project site and activities on the site to achieve a reduction in pollutants to the maximum extent practicable, both during and following development of the proposed municipal-supply water well and associated pipeline, and to control urban runoff after the project is constructed and the well (if approved for operation post well testing) are in operation. This shall include, but shall not be limited to the provision of adequate setback distances from any creek to protect against scouring and erosion of the pipeline fill during strong storm events. An engineered landscape embankment system shall be designed to ensure adequate protection against exposing the new constructed pipeline during flooding events.

Noise

NOI-1 If the District selects the Backup Well site for development of Well 18, a noise barrier with a minimum height of 16 feet shall be erected along the southern Backup Well site boundary as shown in Figure XIII-4. The District shall install an effective noise barrier; an effective barrier requires a weight of at least 2 pounds per square foot of face area with no decorative cutouts, perforations, or line-of-sight openings between shielded areas and the source. Examples of temporary barrier material includes 5/8-inch plywood, 5/8-inch oriented-strand board, or sound blankets capable of providing a minimum sound transmission loss (STC) of 27 or a Noise Reduction Coefficient (NRC) of 0.85.

Transportation

TRAN-1 The construction contractor would provide adequate traffic management resources, as determined by the District. The District shall require a construction traffic management plan for work in public roads that complies with the Work Area Traffic Control Handbook, or other applicable standard, to provide adequate traffic control and safety during excavation activities. The traffic management plan shall be prepared and approved by the District prior to initiation of excavation or pipeline construction. At a minimum this plan shall include how to minimize the amount of time spent on construction activities; how to minimize disruption of vehicle and alternative modes of transport traffic at all times, but particularly during periods of high traffic volumes; how to maintain safe traffic flow on local streets affected by construction at all times, including through the use of adequate signage, protective devices, flag persons or police assistance to ensure that traffic can flow adequately during construction; the identification of alternative routes that can meet the traffic flow requirements of a specific area, including communication (signs, webpages, etc.) with drivers and neighborhoods where construction activities would occur; and at the end of each construction day roadways shall be prepared for continued utilization without any significant roadway hazards remaining.

TRAN-2 The District shall require that all disturbances to public roadways be repaired in a manner that complies with the Standard Specifications for Public Works Construction (green book) or other applicable County of San Bernardino standard design requirements.

Tribal Cultural Resources

TCR-1 The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in MM CUL-2, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

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

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