# SAN BERNARDINO COUNTY
# INITIAL STUDY/NOTICE OF PREPARATION
# ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

**PROJECT LABEL: Yermo Road Industrial Project**

| | | | |
|---|---|---|---|
| ***APNs:*** | 0537-022-33, 34, 35, 36, 37, 39; and 0537-041-10, 11, 12 | ***USGS Quad:*** | Yermo 7.5 |
| ***Applicant:*** | Herb Chase<br>Ocean Alta, LLC<br>herb@scilogis.com | ***T, R, Section:*** | T9N, R1E, Sec. 3 and 4, San Bernardino Base and Meridian |
| ***Location*** | 87.7 acres located 0.5 miles east of the Ghost Town Road/Daggett Yermo interchange at I-15, north side of Yermo Road. | ***Thomas Bros:*** | NA |
| ***Project No:*** | PROJ-2024-00154 | ***Community Plan:*** | Yermo Community Action Guide (CAG) |
| ***Rep*** | Nicole Criste<br>Terra Nova Planning & Research, Inc.<br>ncriste@terranovaplanning.com | ***LUZD:*** | Rural Living; RL-10: 10-acre minimum lot size |
| ***Proposal:*** | General Plan Amendment, Zone Change and Conditional Use Permit for a ±1.76 million SF warehouse and distribution facility. | ***Overlays:*** | Burrowing owl; Desert Tortoise (sparse population); |

**PROJECT CONTACT INFORMATION:**

***Lead agency:*** County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

***Contact person:*** Precious McDuffie, Planner
***Phone No:*** (909) 387-4537
***E-mail:*** Precious.McDuffie@lus.sbcounty.gov

**PROJECT DESCRIPTION:**

The applicant proposes the development of 1,765,000± square feet (SF) of industrial warehouse and distribution space on an 87.72-acre site located on the north side of Yermo Road, approximately 0.5 miles east of the Ghost Town Road/Daggett Yermo I-15 interchange in San Bernardino County, California (*Exhibit 1: Vicinity Map; Exhibit 2: Location Map*). The site consists of nine vacant parcels with a land use and zoning designation of RL-10 (Rural Living,10-acre minimum). The Project includes a General Plan Amendment (GPA) to redesignate the site from

RL to Limited Industrial (LI), and concurrent Zoning Amendment to redesignate the site from RL-10 to Community Industrial (IC), and a Conditional Use Permit (CUP) to allow for the construction and operation of the proposed warehouse and distribution facilities. *(Exhibit 3: Existing and Proposed General Plan Designations; Exhibit 4: Existing and Proposed Land Use Zoning Districts)*

The Project site plan proposes two industrial buildings totaling 1,764,560 SF, 866 car parking stalls, 460 trailer parking stalls, 683,180 SF of landscaping, and five (5) stormwater retention basins totaling 276,839 SF (*Exhibit 5: Project Site Plan*). Building 1 is 1,152,480 SF and Building 2 is 612,080 SF. Both buildings have a maximum height of 50 feet to top of parapet. Building 1 has a total of 176 truck loading docks and Building 2 has a total of 98 truck loading docks located on the north and south sides of the buildings. The site will be accessed from three (3) driveways along Yermo Road, each providing both ingress and egress. Buildings and on-site parking will be accessed via internal drive aisles.

This Initial Study (IS) has been prepared to evaluate the potential environmental impacts of the project and to define the scope of the forthcoming Environmental Impact Report (EIR). It ensures CEQA compliance and facilitates informed public and agency input during the EIR scoping process.

<u>Utilities and Service Providers</u>
The Project will be serviced by the following utilities and service providers:

1. Domestic Water: Private well
2. Wastewater: Private, on-site septic system
3. Solid Waste: Burrtec Waste
4. Electricity: Southern California Edison
5. Natural Gas: Southwest Gas
6. Cable: Time Warner Cable
7. Telecommunication: Verizon

### *Surrounding Land Uses and Setting*

The Project site is within the boundaries of the unincorporated community of Yermo, San Bernardino County. The Project site is not an environmental justice community and is not considered a sensitive environment as identified in the Countywide Policy Plan. The Project site is located 0.5 miles east and 1.75 miles north of the nearest environmental justice areas (San Bernardino Policy Map: HZ-10 Environmental Justice and Legacy Communities, 2022).

As shown on the San Bernardino County Land Use Map, the Project Site is within a Rural Living land use category. The following table lists the existing adjacent land uses and zoning.

| Existing Land Use and Land Use Zoning Districts | | | |
|---|---|---|---|
| **Location** | **Existing Land Use** | **Land Use Category** | **Zoning** |
| Project Site | Vacant | Rural Living (RL) | Rural Living: 10-acre min. lot size (RL-10) |
| North | I-15 Freeway, vacant lands | Rural Living (RL) | Rural Living: 10-acre min. lot size (RL-10) |
| South | Yermo Road, Marine Corps Logistics Base Barstow – Yermo Annex | RLM (Resource/Land Management) | RC (Resource Conservation, 200 Acres min. for designation) |
| East | Vacant, possible encampment or debris dump | Rural Living (RL) | Rural Living: 10-acre min. lot size (RL-10) |
| West | Vacant | Rural Living (RL) | Rural Living: 10-acre min. lot size (RL-10) |

The nearest sensitive receptor to the proposed Project is the single-family residence approximately 825 feet east of the Project site. The Project site is located within a Biological Resource Overlay for burrowing owl and Desert Tortoise (sparse population).

### *Project Site Location, Existing Site Land Uses and Conditions*

The 87.72-acre Project site is located approximately 0.5 miles east of the Ghost Town Road/Daggett Yermo I-15 interchange, on the north side of Yermo Road. The site is currently vacant with a Rural Living (RL-10) land use and zoning designation. The site is sparsely covered with desert shrubs and grasses, and there are signs of anthropogenic impact, with visible off-roading tracks and scattered trash/debris. Telephone poles run along the sites southern border adjacent to Yermo Road.

**Site Photographs**

Source: GoogleEarth, May 2025.
From Yermo Road, southwest corner of site looking northeast towards I-15.

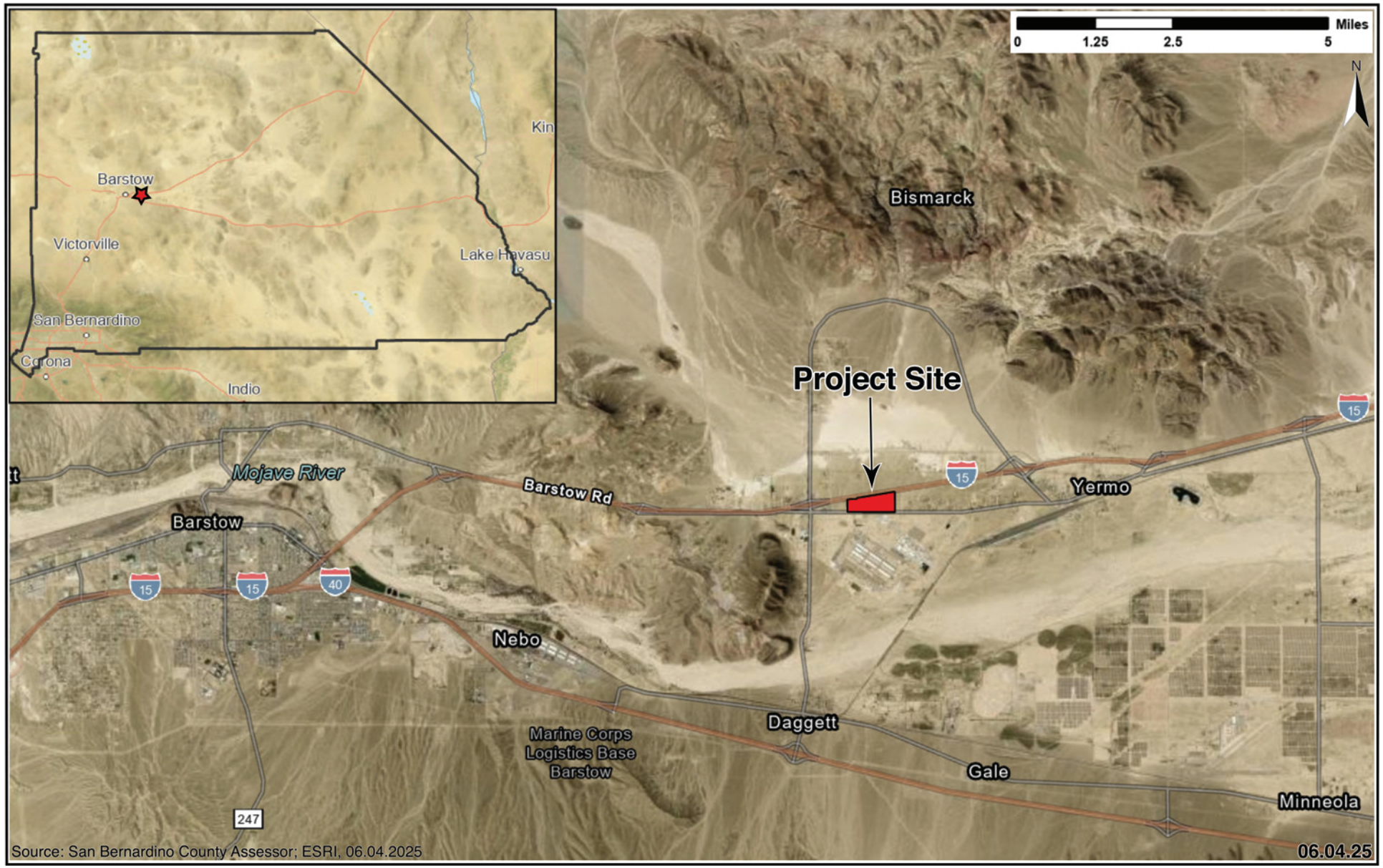
Source: GoogleEarth, May 2025.
From Yermo Road, southeast corner of site looking northwest towards I-15.

Source: GoogleEarth, May 2025.
From I-15, northern site boundary looking south towards Yermo Road.

## ADDITIONAL APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES

List all which apply to this project:

Federal: None.
State of California: Lahontan Regional Water Quality Control Board; Mojave Desert Air Quality Management District (MDAQMD).
County of San Bernardino: Land Use Services Department-Building and Safety, Public Health-Environmental Health Services, Special Districts, Public Works, Traffic Engineering
Local: Yermo Calico Fire Department

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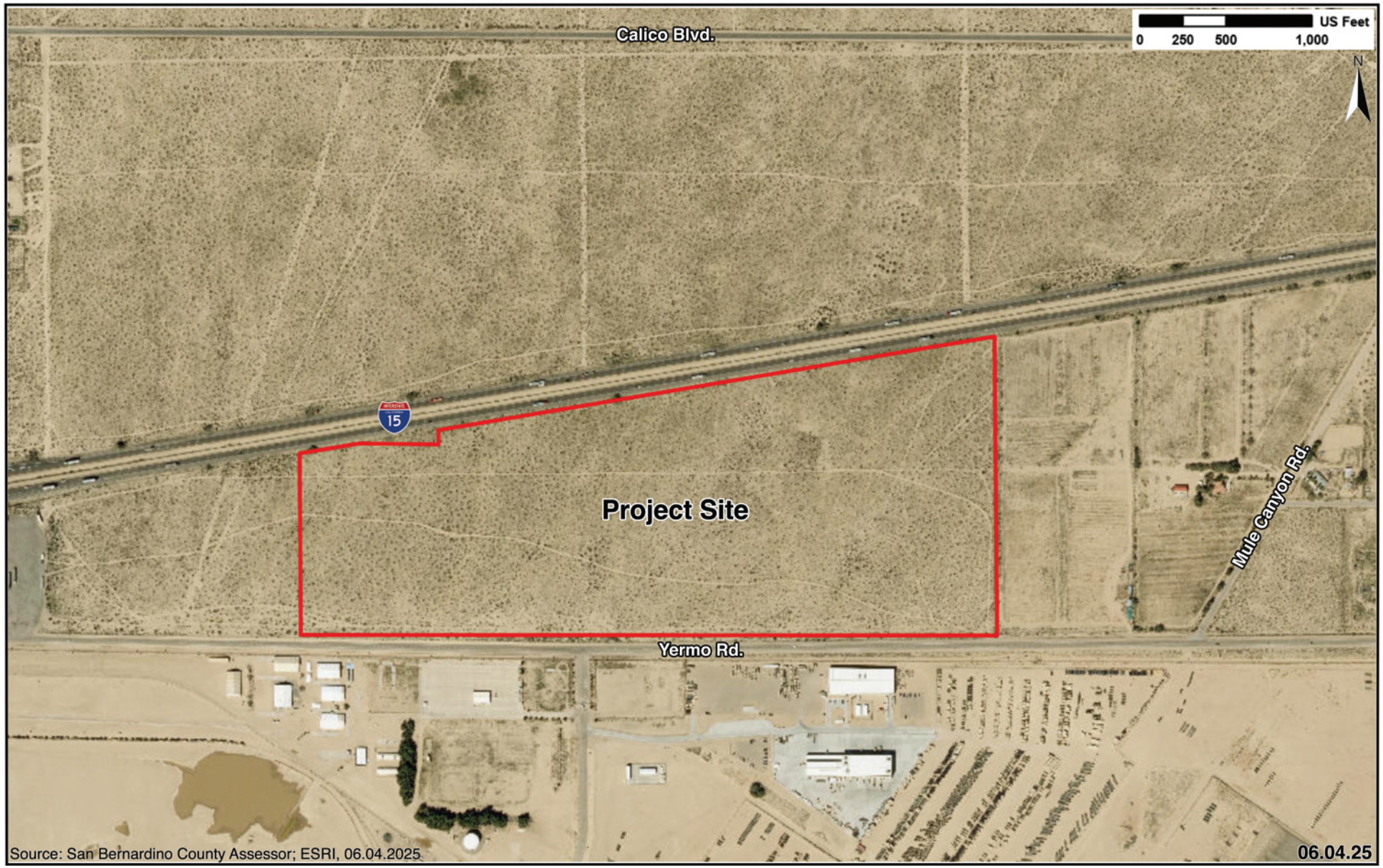
**Vicinity Map**
**Yermo Road Industrial Project**
**Yermo, California**

**Exhibit**
**1**

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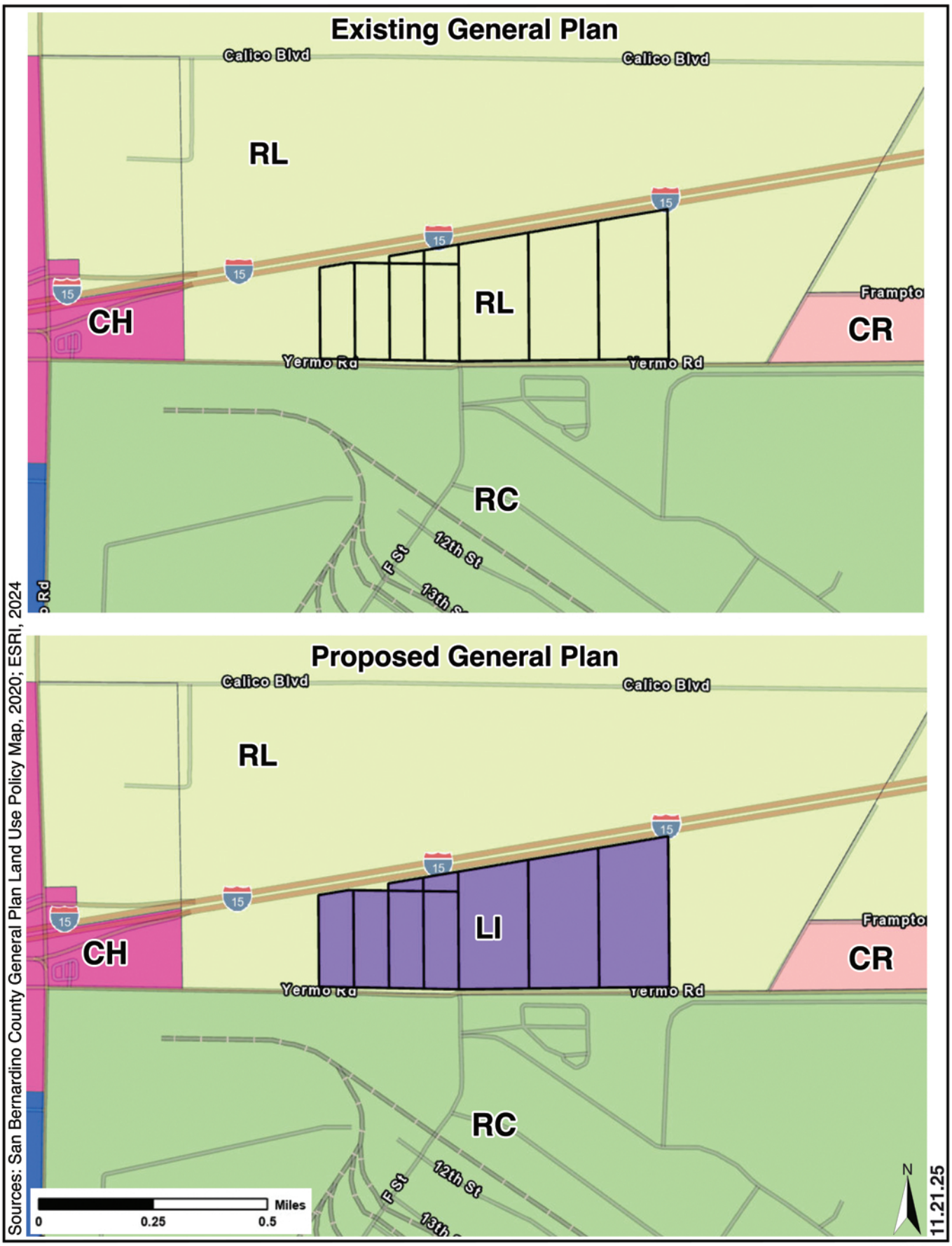
**Location Map**
**Yermo Road Industrial Project**
**Yermo, California**

**Exhibit**
**2**

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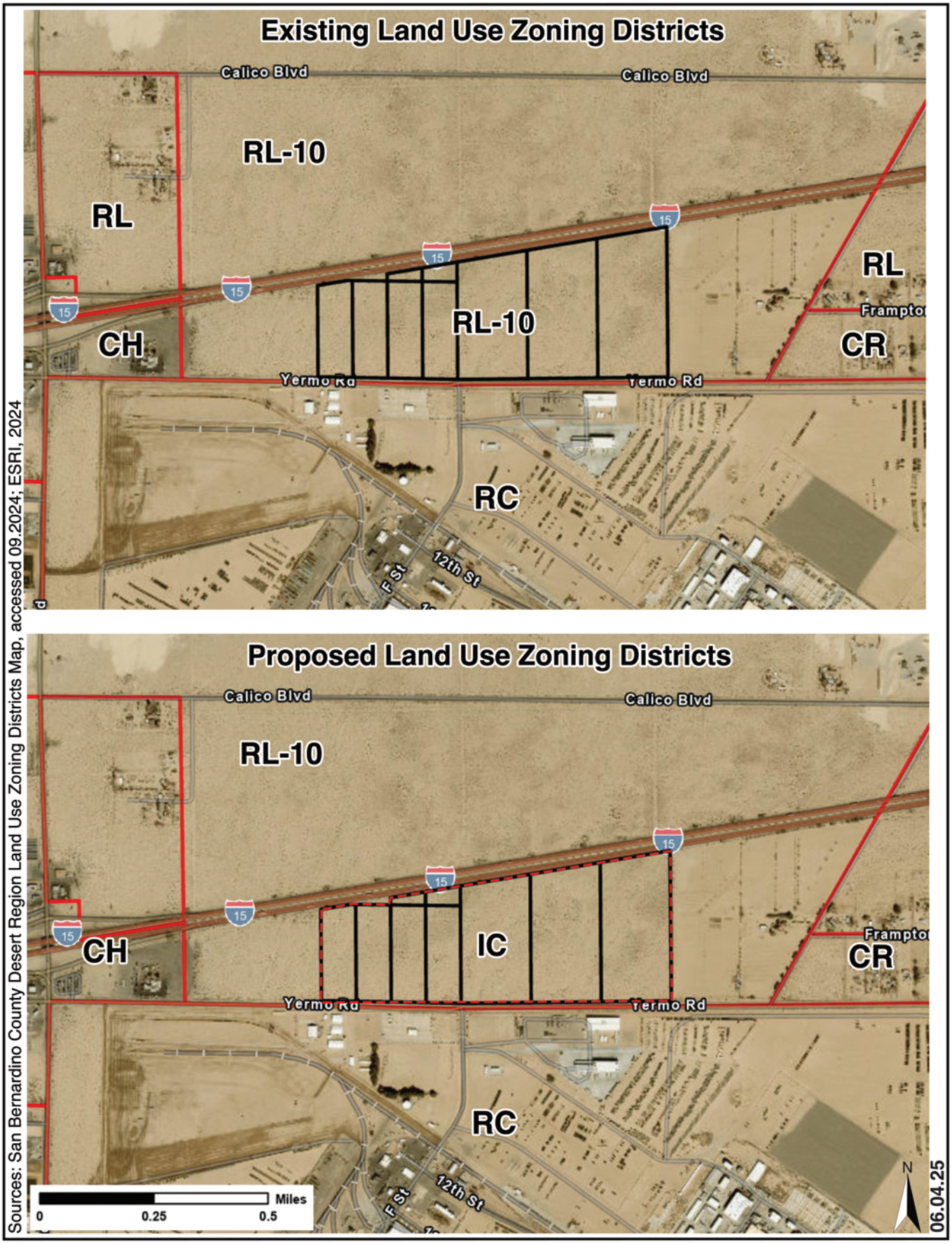
**Existing and Proposed General Plan Designations**
**Yermo Road Industrial Project**
**Yermo, California**

**Exhibit**
**3**

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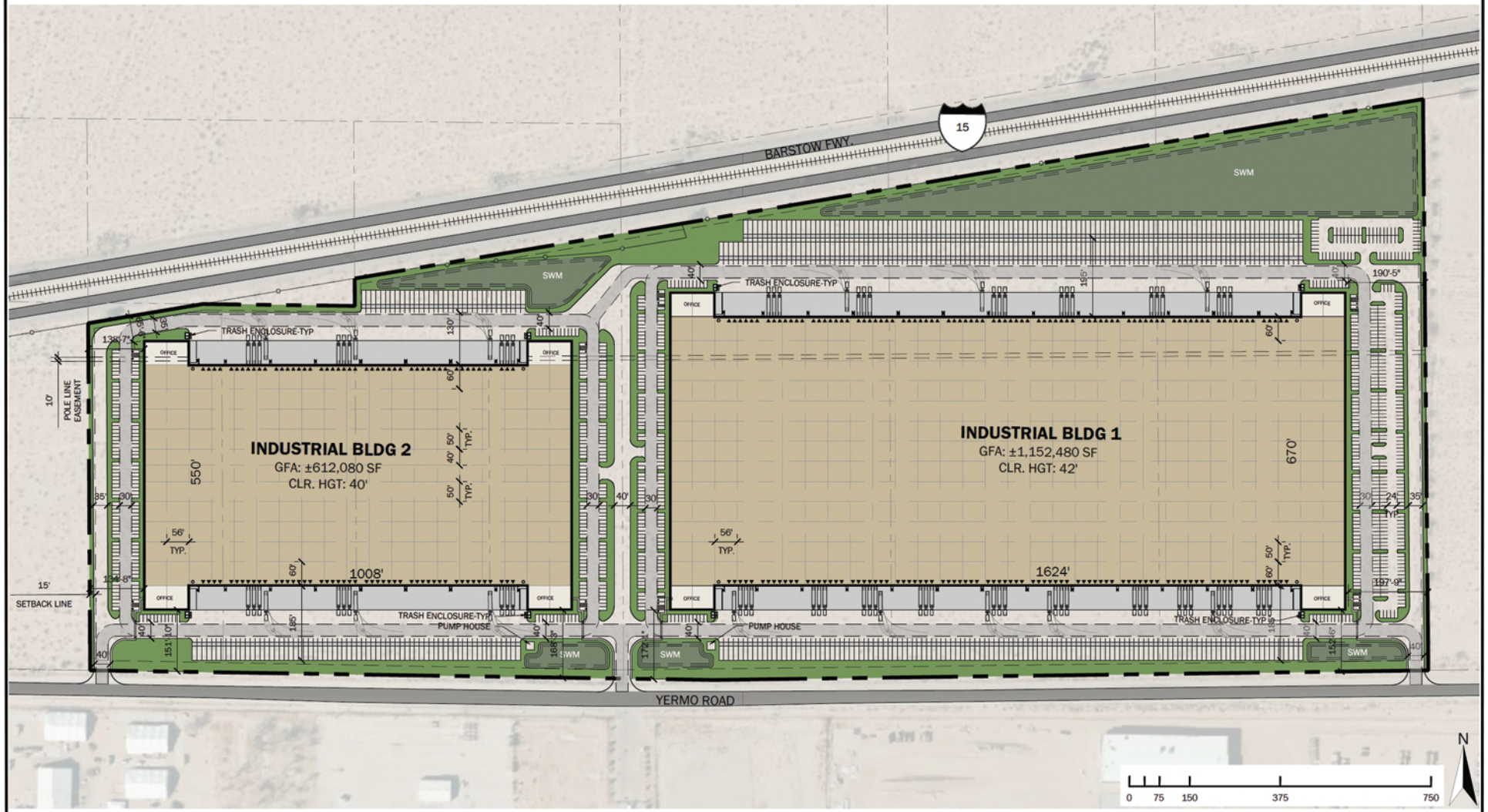
**Existing and Proposed Land Use Zoning Districts**
**Yermo Road Industrial Project**
**Yermo, California**

**Exhibit**
**4**




Source: Ware Malcomb, 01.13.2025

06.04.25

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**Project Site Plan**
**Yermo Road Industrial Project**
**Yermo, California**

**Exhibit**
**5**

## CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

Native American consultation will be addressed in the forthcoming EIR.

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.

## EVALUATION FORMAT

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

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

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

1. **No Impact**: No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact**: No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated**: Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact**: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

Precious McDuffie — 11/21/25

Signature: (prepared by Name, Planner) — Date

Paul Toomey — 11/23/25

Signature:(Name, Supervising Planner) — Date

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | ☒ | ☐ | ☐ | ☐ |
| d) | Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area? | ☐ | ☒ | ☐ | ☐ |

***SUBSTANTIATION:*** *(Check ☒ if project is located within the view-shed of any Scenic Route listed in the General Plan):*
***San Bernardino Countywide Plan Draft PEIR 2019; Submitted Project Materials***

a) *Have a substantial adverse effect on a scenic vista?*

**Potentially Significant Impact**

The project site is located in the unincorporated community of Yermo, within the Unincorporated North Desert Region of San Bernardino County. The North Desert Region is bound primarily by the San Bernardino and San Gabriel Mountain ranges to the south. Much of the region is covered by the Mojave Desert, is largely flat with elevations hovering around 1,000 feet above mean sea level (amsl) and scattered low-elevation mountains ranging between 2,000 and 4,000 feet amsl. The Project proposes a land use and zone change from RL to IC, which would result in development intensities greater than previously permitted. Therefore, the proposed land use and construction of the Project has the potential to impact or partially impact scenic vistas. The Project EIR will further examine to what extent the proposed Project could impact scenic vistas.

b) *Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?*

**Less than Significant Impact**

According to Countywide Plan Policy Map NR-3, *Scenic Routes and Highways*, the portion of the I-15 that borders the site's northern boundary is designated a State Scenic Highway. The site is covered in sparse vegetation, including shrubs and grasses, and shows signs of anthropogenic impact, with visible off-roading tracks and scattered trash/debris. The Project site is currently vacant, undeveloped, and contains no trees, rock outcroppings, or historic buildings; however, the site's vacant, desert landscape provides some scenic value. Because the project site is adjacent to a State Scenic Highway, and scenic resources may be affected by the development of 1.76 million sf of warehouse, the forthcoming EIR shall examine whether or to what extent the proposed Project could impact scenic resources.

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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

**Potentially Significant Impact**

The Project site is in an area that can best be characterized as non-urbanized, with scattered development. Surrounding development is dominated by vacant lands and sparse commercial, residential and military development, and roadways including the I-15 and Yermo Road. The Project proposes a land use and zone change from RL to LI and IC, which would result in development intensities greater than previously permitted. The proposed Project would result in two industrial warehouse and distribution buildings and include on-site landscaping that would be visible to the public. Although the Project shall adhere to County development requirements and architectural review process, the Project EIR should further examine whether or to what extent the proposed Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings.

d) *Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?*

**Less than Significant with Mitigation**

The site is currently vacant with no sources of light or glare. The Project proposes the development of 1.76 million square feet of industrial warehouse and distribution space, which would introduce new sources of daytime and nighttime light and glare. Industrial lighting and glare could have significant adverse impacts on surrounding properties or travelers along adjacent roadways if not properly managed. Although impacts from light and glare are anticipated to be less than significant with adherence to County lighting requirements, the Project EIR should further examine the potential adverse impacts Project lighting and glare within and beyond the Project boundary.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | *Issues* | *Potentially Significant Impact* | *Less than Significant with Mitigation Incorporated* | *Less than Significant* | *No Impact* |
|---|---|---|---|---|---|
| **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:*** *(Check ☐ if project is located in the Important Farmlands Overlay):*

***Countywide Plan*; *California Department of Conservation Farmland Mapping and Monitoring Program; Submitted Project Materials***

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?*

**No Impact**

The subject site is vacant and undeveloped and is not in active agricultural use. According to the California Department of Conservation Farmland Mapping and Monitoring Program interactive map, there is no Prime Farmland, Farmland of Statewide Important, Unique Farmland, or farmland under other categories on the Project site or in its vicinity. Likewise, the Agricultural Resources map provided in the Natural Resources Element of the Countywide Plan (*NR-5 Agricultural Resources*) shows no significant farmland resources in the Project area. The nearest farmland designation, Farmland of Statewide Importance, is located 3.4 miles southeast of the project site.

The Project would therefore not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The proposed action has no impact with regard to question II.a, and no further discussion is needed in the forthcoming EIR.

b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**Less than Significant Impact**

According to the California Williamson Act Enrollment Finder interactive map, the Project site is not under a Williamson Act contract. The site is currently zoned for Rural Living (RL), which currently allows various agricultural activities such as accessory crop production and agricultural structures. The Project proposes to redesignate the site to Community Industrial (IC), which generally does not allow agricultural uses with few permitted exceptions. The proposed land use and zone change would largely limit the sites potential for agricultural uses, which is currently allowed under the existing RL designation. Therefore, the forthcoming EIR shall evaluate potential zoning conflicts resulting from the proposed Project.

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))?*

**No Impact**

The subject site is currently zoned for Rural Living (RL), and is not zoned for forest land, timberland, or timberland production. The adjacent land to the south of the site and zoned for Resource Conservation is occupied by the military base and does not include forest or timber land. The proposed Project would not cause the rezoning of forest land, timberland, or timberland production. The proposed action has no impact, and no further discussion is needed in the upcoming EIR.

d) *Result in the loss of forest land or conversion of forest land to non-forest use?*

**No Impact**

The Project site is comprised of undeveloped desert land and is primarily vegetated by scrubland. There is no forest land on the subject site or in the vicinity. Development of the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. The proposed action has no impact with regard to question II.d, and no further discussion is needed in the upcoming EIR.

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?*

**No Impact**

The subject site is vacant and undeveloped and is not in active agricultural use. The Project site is comprised of undeveloped desert land and is primarily vegetated by scrubland. There is no forest land on the subject site or in the vicinity. Development of the proposed Project would not result in the loss of existing Farmland or forest land. The proposed action has no impact with regard to question II.e, and no further discussion is needed in the upcoming EIR.

**For questions II. a and c-e, no significant adverse impacts are identified or anticipated and no mitigation measures are required. Project impacts for question II.b will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **III.** | **AIR QUALITY -** Where available, the significance criteria established by the applicable air quality management district or air pollution control district might 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:*** *(Discuss conformity with the Mojave Desert Air Quality Management Plan, if applicable):*

***Countywide Plan*; *MDAQMD 2020 CEQA and Federal Conformity Guidelines; Submitted Project Materials***

a) *Conflict with or obstruct implementation of the applicable air quality plan?*

**Potentially Significant Impact**

The Project site is within the Mojave Desert Air Basin (MDAB), and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). MDAQMD is geographically the second largest of the 35 air districts in the State of California. All development within the City is subject to MDAQMD's 2020 "California Environmental Quality Act (CEQA) and Federal Conformity Guidelines." MDAQMD operates and maintains 13 regional air quality monitoring stations in different cities throughout its jurisdiction. The nearest monitoring station to the Project is located on Adobe Road, east of the Project site.

Criteria air pollutants are contaminants for which state and federal air quality standards (California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS)) have been established. MDAQMD is in nonattainment for ozone (O3) and inhalable particulate matter less than 10 microns in size (PM10) under the California and National Ambient Air Quality Standards (CAAQS and NAAQS, respectively). As a result, MDAQMD has adopted federal attainment plans for ozone and PM10 under the Federal Clean Air Act.

Ambient air quality in the MDAQMD, including the Project area, does not exceed state and federal standards for carbon monoxide, nitrogen dioxides, particulate matter less than 2.5 microns in size, sulfur dioxide, lead, sulfates, hydrogen sulfide, or visibility reducing particles.

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

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?*

**Potentially Significant Impact**

An impact is considered potentially significant if concentrations of emissions exceed the State or Federal Ambient Air Quality Standards. The two primary pollutants of concern in the MDAB, are ozone ($O_3$) and particulate matter ($PM_{10}$). Any development project or activity resulting in emissions of PM10, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM10.

At this time, it is not known whether or to what extent development and improvements facilitated by the proposed Project will impact non-attainment criteria pollutants. The County has determined that an air quality study should be prepared to further evaluate the potential for significant levels of air pollutants related to the Project. Potential air quality impacts will be assessed in an air quality analysis and further documented in the forthcoming EIR.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

**Potentially Significant Impact**

The MDAQMD considers residences, schools, daycare centers, playgrounds, and medical facilities as sensitive receptor land uses. According to the MDAQMD CEQA Guidelines, projects within specified distances of sensitive receptors must be evaluated using significance threshold criteria number 4:

> (4) [A project is considered significant if it] exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or

equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.

The threshold distances from sensitive receptors for the provided project types, as specified by the MDAQMD, are as follows:

- Any industrial project within 1000 feet;
- A distribution center (40 or more trucks per day) within 1000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The Project proposes a warehouse distribution center within 1,000 feet of an existing single-family residence and therefore has the potential to expose sensitive receptors to substantial pollutant concentrations. At this time, it is not known whether or to what extent development and improvements facilitated by the proposed Project will expose sensitive receptors to substantial pollutant emissions. The County has determined that an air quality study and Health Risk Assessment should be prepared to further evaluate the potential for significant levels of air pollutants related to the Project. Potential impacts will be assessed in a Health Risk Assessment and further documented in the forthcoming EIR.

d) *Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?*

**Potentially Significant Impact**

Development and improvements facilitated by the proposed Project have the potential to result in short-term and long-term odors. Construction-related odors would be temporary and quickly dispersed below detectable levels as distance from the construction area increases. Although the Project does not propose uses that typically emit odors once in operation, potential impacts from odors and other emissions should be further considered and assessed. Impacts will be evaluated in the forthcoming EIR.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | *Issues* | *Potentially Significant Impact* | *Less than Significant with Mitigation Incorporated* | *Less than Significant* | *No Impact* |
|---|---|---|---|---|---|
| **IV.** | **BIOLOGICAL RESOURCES -** Would the project: | | | | |
| a) | Have substantial adverse effects, 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, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | ☐ | ☒ | ☐ | ☐ |
| c) | Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☒ |
| d) | Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☒ | ☐ | ☐ |
| e) | Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☒ | ☐ | ☐ |
| f) | Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan? | ☐ | ☐ | ☐ | ☒ |

***SUBSTANTIATION:*** *(Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database ☒):*

***Countywide Plan*; *Submitted Project Materials;***

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

**Less than Significant with Mitigation**

The Project site occurs in a sparsely developed area of the county. According to the County's Biotic Resources map, the project site has a desert tortoise (sparse population) and burrowing owl overlay. The potential for sensitive species to occur onsite, including desert tortoise and burrowing owl, is not currently known. A biological resource analysis must be conducted to determine whether any sensitive species occur on the site, and what impacts the development of the Project could have on those species if they occur. The results of the biological resource analysis will be summarized in the EIR, and mitigation measures prepared if necessary to assure that impacts to sensitive species are reduced to less than significant levels.

b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?*

**Less than Significant with Mitigation**

According to the U.S. Fish and Wildlife Service's National Wetlands Inventory map, the Project site does not contain any riparian habitats. A biological resource analysis must be conducted to determine whether any other sensitive natural communities occur on the site, and what impacts the development of the Project could have on those communities if they occur. The results of the biological resource analysis will be summarized in the EIR, and mitigation measures prepared if necessary to assure that impacts to sensitive natural communities are reduced to less than significant levels.

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?*

**No Impact**

According to the U.S. Fish and Wildlife Services National Wetlands Inventory map, the Project site does not contain any wetlands or riparian habitats. The proposed Project has no impact on wetlands, and no further discussion is needed in the forthcoming EIR.

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?*

**Less than Significant with Mitigation**

The Project site is located immediately south of the I-15 freeway and north of Yermo Road, in an area characterized by scattered residential, commercial, and military development. The project site has not been identified as occurring within a Wildlife Corridor or Linkage in the San Bernardino Countywide Plan; however, the California Department of Fish and Wildlife (CDFW) Terrestrial Connectivity dataset identifies the site as a Connectivity Rank 4: Conservation Planning Linkage, which represents the best connection (linkage) between core natural areas to maintain habitat connectivity. A biological resource analysis must be conducted to determine whether and what impacts the development of the Project could have on migratory species or nursery sites if they occur. The EIR will include an analysis of the potential impacts of the project to wildlife movement and provide mitigation measures if necessary to assure that impacts to wildlife movement are reduced to less than significant levels.

e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

**Less than Significant with Mitigation**

San Bernardino County Development Code Section 88.01.060, Desert Native Plant Protection, provides regulations for the removal or harvesting of specified desert native plants in order to preserve and protect the plants and to provide for the conservation and wise use of desert resources. Section 88.01.060 outlines desert native plants that shall not be removed or altered, with the exception of fruit, without obtaining a Tree or Plant Removal Permit.

A biological resource analysis must be conducted to determine whether and what impacts the development of the Project could have on biological resources if they occur. The results of the biological resource analysis will be summarized in the EIR, and mitigation measures prepared if necessary to assure that impacts to sensitive natural communities are reduced to less than significant levels.

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?*

**No Impact**

According to the CDFW's California Regional Conservation Plans map, the project site is not within a Natural Community Conservation Plan/Habitat Conservation Plan (NCCP) area. Moreover, the project site does not fall within an Open Space zoning district, as designated by the San Bernardino County Development Code. Therefore, the proposed project would not result in conflicts with provisions, goals, or policies, of the NCCP. No impact would occur, and no further discussion is needed in the forthcoming EIR.

**For questions IV. c and f, no significant adverse impacts are identified or anticipated and no mitigation measures are required. Project impacts for all other questions will be fully analyzed in the forthcoming EIR.**

| | *Issues* | *Potentially Significant Impact* | *Less than Significant with Mitigation Incorporated* | *Less than Significant* | *No Impact* |
|---|---|---|---|---|---|
| **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 outside of formal cemeteries? | ☐ | ☐ | ☐ | ☒ |

***SUBSTANTIATION:*** (Check if the project is located in the Cultural ☐ or Palaeontologic ☐ Resources overlays or cite results of cultural resource review): ***San***

***Countywide Plan; Submitted Project Materials***

a) *Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

**Potentially Significant Impact**

According to PRC §5020.1(j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the Lead Agency (Title 14 CCR §15064.5(a)(1)-(3)).

Regarding the proper criteria of historical significance, CEQA guidelines mandate that "a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

The Project site is currently vacant, and no historic structures occur on the property. Although the Project site is not known to have harbored resources, a cultural (historic and archaeological) resources survey and report are being prepared for the proposed Project and its findings will be incorporated into the forthcoming EIR.

b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**Potentially Significant Impact**

Archaeological resources listed on state and/or national registers are found in all four geographic regions of the county, with most located within the North Desert Region where the Project site is located. Although the Project site is not known to harbor archaeological resources, a cultural (historic and archaeological) resources survey and report are being prepared for the proposed Project and its findings will be incorporated into the forthcoming EIR.

c) *Disturb any human remains, including those outside of formal cemeteries?*

**No Impact**

There are no known cemeteries or buried human remains located on the project site. However, there is always the possibility of human remains that could exist beneath the surface. In the event human remains are encountered during earth removal or disturbance activities, the project would be required to comply with the California Health and Safety Code Section 7050.5, PRC 5097.98. All construction activities will stop at the location of the find, and the County's Coroner shall be called to investigate the remains and determine its significance. If appropriate, Native American descendants will be contacted and notified of the discovery as they have final disposition of the remains. State law provides a thorough process by which the identification of humans remain will be managed. As such, no impacts related to disturbance of human remains are expected to occur because of the Project's implementation. No further discussion of this issue will be provided in the EIR.

**For question V. c no significant adverse impacts are identified or anticipated and no mitigation measures are required. Project impacts for all other questions will be fully analyzed in the forthcoming EIR.**

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

***SUBSTANTIATION: Countywide Plan; Submitted Materials***

a) *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**Less than Significant Impact**

Nuclear energy, fossil fuels (e.g. oil, coal and natural gas) and renewable sources (e.g. wind, solar, geothermal and hydropower) are various sources of energy. The electrical energy to the Project area is provided by Southern California Edison (SCE). Natural gas service is provided to the Project area by Southwest Gas Corporation. Natural gas is mainly utilized for water heaters and heating of homes, as well as a broad range of commercial and industrial equipment. Both SCE and Southwest Gas offer various programs and incentives for all users to help reduce energy consumption.

The proposed land use and zone change would increase the development intensity of the site compared to existing conditions, which will likely increase anticipated energy demands. Ultimate development of the site would require energy for both construction and operation. The amount required is currently undetermined but is expected to result in less than significant amounts of use. The EIR will estimate the amount of energy that the Project will require during construction and operation and will include sustainability measures, as applicable, to ensure that proposed energy use is not excessive or wasteful.

b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**No Impact**

In 2002, California established a Renewable Portfolio Standard (RPS) that requires a retail seller of electricity to include in its resource portfolio a certain amount of electricity from renewable energy sources, such as wind, geothermal, small hydro, and solar energy. Senate Bill (SB) 100, signed into law in September 2018, requires utilities to

procure 60 percent of their electricity from renewables by 2030 and sets as a State policy that State agencies and end-use retail customers receive 100 percent of energy from renewable and zero-carbon resources by 2045. To ensure retail sellers meet their RPS requirement, the California Public Utilities Commission (CPUC) is responsible for establishing enforcement procedures and imposing penalties for non-compliance with the program (CPUC, 2018).

The Project would be required by law to comply with enhanced building/utilities energy efficiencies mandated under the California Building Code (e.g., Title 24, the California Green Building Code). Although the Project would increase development intensities on the site, future development of the site would be required to develop in accordance with the building and energy codes adopted at the time of construction to assure there is no obstruction to renewable or energy efficiency plans. Therefore, the Project will not obstruct plans for renewable energy or energy efficiency, and no further discussion of this subject is required in the EIR.

**For questions VI.b no significant adverse impacts are identified or anticipated and no mitigation measures are required. Project impacts for question VI.a will be fully analyzed in the forthcoming EIR.**

| | *Issues* | *Potentially Significant Impact* | *Less than Significant with Mitigation Incorporated* | *Less than Significant* | *No Impact* |
|---|---|---|---|---|---|
| **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 on or off site landslide, lateral spreading, subsidence, liquefaction or collapse? | ☐ | ☒ | ☐ | ☐ |
| d) | Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (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 sewers are not available for the disposal of wastewater? | ☐ | ☐ | ☒ | ☐ |
| f) | Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☒ | ☐ |

***SUBSTANTIATION:*** *(Check ☐ if project is located in the Geologic Hazards Overlay District):* ***Countywide Plan; Submitted Project Materials***

***Countywide Plan; Submitted Project Materials***

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*

**No Impact**

The Project site is not underlain by any known fault. The two closest faults are the Calico-Hidalgo Fault approximately 5.5 miles to the east, and the Lenwood-Lockhart Fault approximately 8.9 miles southwest. The site will not be subject to ground rupture, and no impact is expected. As a result, the EIR will not address this issue any further.

*ii) Strong seismic ground shaking?*

**Less than Significant with Mitigation**

The Project is located in a seismically active region where local and regional faults can produce severe ground shaking. The two closest faults are the Calico-Hidalgo Fault approximately 5.5 miles to the east, and the Lenwood-Lockhart Fault approximately 8.9 miles southwest. The Project will be required to implement the most current Building Code in effect at the time that the Project is undertaken. The Code contains specific measures to address strong ground shaking, to protect structures from failure. Nevertheless, the forthcoming EIR will consider site and building design and engineering that mitigates the ground shaking threat in the area.

*iii) Seismic-related ground failure, including liquefaction?*

**Less than Significant with Mitigation**

The Project site is not located in an area identified on County map HZ-2 *Liquefaction & Landslide* as susceptible to liquefaction. The closest liquefaction potential identified in the County occurs approximately 22 miles south. Nonetheless, a Project-specific geotechnical report is being prepared which will further assess the Project's vulnerability to liquefaction hazards. The Project geotechnical report and EIR will evaluate the potential liquefaction hazard in greater detail and set forth mitigation that can reduce this hazard, if present.

*iv) Landslides?*

**No Impact**

The Project site is relatively flat and not located in an area identified on County map HZ-2 *Liquefaction & Landslide* as susceptible to landslide. The nearest mountain slope is located approximately 0.9 miles southwest. Therefore, there will be no threat of landslides on the site as a function of site topography. As a result, the EIR will not address this issue any further.

b) *Result in substantial soil erosion or the loss of topsoil?*

**Less than Significant with Mitigation**

The Project site is in an area identified on County map HZ-11 *Wind Erosion Hazards* as being in a highly susceptible to wind erosion. Project-specific geotechnical analyses will be prepared that characterize on-site surface and subsurface soils to determine the site's risk for soil erosion. Without proper soil preparation and ongoing stabilization, Project development could create a significant soils erosion hazard that could adversely affect downwind properties and the traveling public. The forthcoming EIR will summarize the site conditions, evaluate potential impacts, and recommend effective mitigation measures to reduce impacts to less than significant levels.

c) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?*

**Less than Significant with Mitigation**

While the physical conditions that create instability of a geologic unit cannot be easily modified, specific methods of construction can substantially address these hazards and ensure the integrity of structures if geologic unit or soil instability occurs. These include optimum soil compaction, use of spreads footings to reduce foundation distortion during a seismic event with on-site liquefaction, and by other means. A Project-specific geotechnical report is being prepared which will further assess the Project's vulnerability to geotechnical hazards. The Project geotechnical report and EIR will evaluate the potential liquefaction hazard in greater detail and set forth mitigation that can reduce this hazard.

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?*

**Less than Significant Impact**

According to the U.S. Department of Agriculture Natural Resources Conservation Service online Web Soil Survey map, the Project site consist primarily of cajon sand and loamy fine sand. The soil is categorize as having a low potential for expansion. Impacts from expansive soil are expected to be less than significant. Nonetheless, the forthcoming EIR will document site conditions, analyze the Project's susceptibility for expansive soil and ensure that the potential for expansive soils is adequately addressed.

e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

**Less than Significant Impact**

The site is not currently served by wastewater collection or treatment services and will rely on septic tanks and leach lines for wastewater treatment. A Project-specific geotechnical report is being prepared which will further assess the site's ability to support an onsite septic system. The Project geotechnical report and EIR will evaluate the site's soils in greater detail and set forth recommendations or mitigation to reduce potential hazards with regard to septic systems.

f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

**Less than Significant Impact**

San Bernardino County contains numerous geologic units sensitive for paleontological resources. Notable fossil localities in San Bernardino include the Marble Mountains; the Barstow Fossil Beds in the Rainbow Basin National Natural Landmark near Barstow; the Calico Lakebeds; and Lake Manix, a former lake in the present-day Mojave Valley northeast of Yermo. According to the General Plan Draft EIR (2019), the North Desert Region, which includes the Project site, is characterized by broad alluvial plains between scattered mountain outcrops which consist of granitic bedrock or volcanic deposits that have little to no paleontological potential. While impacts are expected to be less than significant, the site and conditions that would support the occurrence of paleontological resources within the Project's boundaries will be further analyzed in the forthcoming EIR.

**For questions VII.a.i and iv, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Project impacts for all other questions will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **VIII.** | **GREENHOUSE GAS EMISSIONS –** Would the project: | | | | |
| a) | Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☒ | ☐ | ☐ | ☐ |
| b) | Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? | ☒ | ☐ | ☐ | ☐ |

***SUBSTANTIATION:***
***Countywide Plan; Submitted Project Materials***

a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

**Potentially Significant Impact**

During construction, GHG emissions would result from employee commutes, the use of heavy machinery, transportation of materials, and energy-intensive processes like concrete production and steel manufacturing. At buildout, the Project may cause a substantial increase in GHG emissions due to increased vehicle trips to and from the site, ongoing energy use for heating, cooling, and lighting, and emissions from equipment operation. Considering how motor vehicles are a principal source of GHGs, the Project will directly contribute to local and regional GHG emissions. An air quality emissions analysis and report will be prepared to quantify the Project's GHG emissions based on the most current version of the CalEEMod model. The forthcoming EIR will summarize the results of this analysis for Project construction and operation and determine feasible mitigation measures to reduce GHG emissions below significant thresholds.

b) *Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

**Potentially Significant Impact**

To assess whether or to what extent the Project would conflict with MDAQMD GHG emission thresholds and the San Bernardino County Regional Greenhouse Gas Reduction Plan, an air quality emissions analysis and report will be prepared to quantify the Project's GHG emissions, and the forthcoming EIR will determine the proper mitigation measures necessary for the Project to be within compliance with the GHG reduction plan, as well as applicable policies and regulations.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **IX.** | **HAZARDS AND HAZARDOUS MATERIALS –** Would the project: | | | | |
| a) | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| 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:***

***Countywide Plan; Submitted Project Materials***

a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

**Less than Significant Impact**

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under Title 22 of the California Code of Regulations (CCR), the term "hazardous substance" refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) ignitability; (2) corrosivity; (3) reactivity; and (4) toxicity.

A hazardous material is defined as a substance or combination of substances which may either (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed.

The San Bernardino County Fire Department's Hazardous Materials Division oversees and regulates businesses in the County that transport, store or use hazardous materials in larger quantities. During construction, a variety of potentially toxic or hazardous materials, though common, could be used in the construction of the Project, including solvents, oils, paints, and similar material some of which could require special but temporary onsite storage and management. During operation, cleaners and solvents may be used for daily maintenance yet these materials may not be transported, used, or storage at quantities that pose a hazardous risk. While hazardous materials storage or distribution is not envisioned for the proposed Project, in the event such uses are proposed it must be certified to handle hazardous material. The forthcoming EIR will analyze the Project's transport, use and disposal of hazardous material during construction and operation to further evaluate Project construction and operations and confirm impacts will be less than significant.

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?*

**Less than Significant Impact**

As noted previously, the operation of the proposed Project not expected to handle significant amounts or especially hazardous materials to the degree of creating an upset and accident condition involving the release of hazardous materials. Neither Project construction nor operation are expected to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Nonetheless, the forthcoming EIR will further evaluate the Project for its potential to cause such hazardous releases.

c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**Less than Significant Impact**

The proposed Project site is located 0.5 miles northeast of the Silver Valley High School. The Project is not expected to generate emissions or handle hazardous or acutely hazardous materials or substances, neither is the site located within one-quarter mile of an existing or proposed school. However, the school is located 0.2 miles south of the intersection of Yermo Road and Dagget-Yermo Road, the nearest truck transportation route with access to the Project site and potential for transporting hazardous materials. The forthcoming EIR will further evaluate the Project for its potential to emit hazardous emissions or handle hazardous materials within a quarter mile of 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?*

**No Impact.**

A search of the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB) lists compiled pursuant to Government Code Section 65962.5 identified no open cases of hazardous waste violations on the Project site. As a result, no impact will occur, and no further discussion of this issue is required in the EIR.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact**

The Project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the Barstow-Dagget Airport, located 5± miles southeast of the Project site. Therefore, the airport's operation is not expected to raise safety hazards or excessive noise concerns in the Project area. No impact will occur, and no further discussion will be included in the EIR.

f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**No Impact.**

According to County map PP-2, Evacuation Routes, the only designated evacuation route in the immediate Project vicinity is the I-15. Other non-designated routes would include major and secondary roadways, such as Yermo Road an Dagget-Yermo Road/Ghost Town Road. The subject site is immediately south of the I-15 but does not

propose or currently have direct access to the freeway. Development of the proposed Project would not interfere with emergency evacuation operations on this route, or any other designated evacuation routes. Access to the Project site would be provided from Yermo Road and individual driveways. Individual driveways would be developed to meet the County standard for fire lanes, and all development within the Project will be subject to review and approval from the San Bernardino County Fire Marshall. Development of the site is subject to requirements of the Title 24 Building Code and Fire Code. During construction adequate access for emergency vehicles must be maintained, as required by the County, including implementation of a traffic management plan to coordinate the high volume of truck trips for construction equipment and building material deliveries, ensuring that hauling and other truck traffic does not impede access along surrounding roadways.

The County updated its adopted Emergency Operations Plan (EOP) in 2018. Given that the Project will not interfere with the local evacuation route and will comply with the local plan review and state fire code, the Project will have no impacts to the implementation of the adopted EOP or any other adopted emergency evacuation plans. No impact will occur, and no further discussion will be included in the EIR.

g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

**Less than Significant Impact**

According to County map HZ-6, *Fire Responsibility Areas*, the Project site is located in a Local Responsibility Area (LRA) meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a Local agency, which is the Yermo-Calico Fire Department, which has mutual-aid agreements with Daggett Volunteer Fire Department, Barstow Fire Protection District, San Bernardino County Fire Department, and the Marine Corps Logistics Base Fire Department. The Project site is located in a Moderate Fire Hazard Severity according to County map HZ-5, Fire Hazard Severity Zones, and in the California Department of Fire and Forestry, 2025 Fire Hazard Severity Zones in State Responsibility Zone Map, as recommended by the Fire Marshall. The Project is not located in an area considered to be at high risk from wildland fires, and the Project will be subject to state and local fire codes to minimize potential impacts related to fires. Nonetheless, the forthcoming EIR will analyze the Project's potential exposure to significant risks from wildland fires.

**For questions IX.d-f, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Project impacts for all other questions will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **X.** | **HYDROLOGY AND WATER QUALITY -** Would the project: | | | | |
| a) | Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | ☐ | ☐ | ☒ | ☐ |
| b) | Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | ☒ | ☐ | ☐ | ☐ |
| c) | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| | i. result in substantial erosion or siltation on- or off-site; | ☐ | ☐ | ☒ | ☐ |
| | ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite; | ☐ | ☐ | ☒ | ☐ |
| | iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of 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:***

***Countywide Plan; Submitted Project Materials***

a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

**Less than Significant Impact**

The Project site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board (LRWQCB). The Project is required to comply with the LRWQCB standards for the protection of water quality. The Project will utilize on-site facilities to retain and detain and treat runoff before discharging off-site. The Project engineer will ensure that the operational BMPs for the Project satisfy local, state, and federal standards. Best management practices will assure that storm flows leaving the site during and after construction are not contaminated with hazardous or otherwise polluting materials. Implementation of these standard requirements will ensure that the Project's potential impact to water quality from runoff will be less than significant. The Project is not expected to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Nonetheless, the results of the preliminary hydrology study and Water Quality Management Plan (WQMP) will be evaluated in the forthcoming EIR to ensure water quality standards will not be violated. A Stormwater Pollution Prevention Plan (SWPPP) will also be required to demonstrate proper management of nuisance and stormwater runoff from the project site.

b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

**Potentially Significant Impact**

The Project site is located in the Lower Mojave River Valley groundwater basin and proposes to drill a private onsite well to supply Project water demand. The Project's operation will increase the local water demand as it will use groundwater for landscaping and a variety of other uses, both potable and non-potable. No reclaimed/recycled wastewater will be available to the Project for landscape irrigation or other non-potable uses. The Project's demand for water is currently not known. The Project's water demand will be analyzed in the forthcoming EIR. A Water Supply Assessment (WSA) will be prepared and summitted to the County for review and approval. The Project is not expected to interfere with any groundwater recharge facility or plan, or impede sustainable groundwater management of the subbasin. The WSA, which will evaluate the Project's potential to substantially decrease groundwater supplies will be summarized in the forthcoming EIR, and the Project's level of impact will be determined.

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

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

**Less than Significant Impact**

The Project site appears to be generally flat and in an area that receives relatively low levels of annual and 100-year rainfall. As described above, the County requires the preparation of a hydrology study to analyze and design the on-site flood control system for the site. The EIR will review the design of the flood control system, and assure that impacts are less than significant, or impose mitigation measures if necessary to assure that neither storm flows nor erosion impact off-site properties or receiving waters.

d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

**Less than Significant Impact**

The project site is more than 110 miles northeast of the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the project site's inland location and lack of nearby waterbodies. According to County map HZ-3, *Dam & Basin Hazards*, the Project site is located approximately 1.2 miles north of the Cedar Springs Dam inundation area and would not be impacted by dam failure. The Project site is located in an area of undetermined flood hazard, FEMA Zone D (FEMA Map Nos.: 06071C3975H and 06071C39444H), however it is not located within a designated FEMA flood hazard zone. Nonetheless, the hydrology study will examine the Project's susceptibility to flooding and the forthcoming EIR will analyze these and other hydraulic and water quality issues.

e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

**Potentially Significant Impact**

The proposed Project will be required to comply with all applicable water quality standards approved by the County and the LRWQCB for both construction activities and long-term operation of the Project. Adherence to the LRWQCB and County's standard requirements related to water quality will ensure there will be no impact to a water quality control plan.

A Water Supply Assessment (WSA) will be prepared and summitted to the County for review and approval. The Project is not expected to interfere with any groundwater recharge facility or plan or impede sustainable groundwater management of the subbasin. The WSA, which will evaluate the Project's potential to substantially decrease groundwater supplies will be summarized in the forthcoming EIR, and the Project's level of impact will be determined.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **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:***

***Countywide Plan; Submitted Project Materials***

a) *Physically divide an established community?*

**No Impact.**

The subject property is vacant and has not been previously developed. There are no existing residences on the site. The site is surrounded by vacant lands and the rights of way of US I-15 and Yermo Road. There are no contiguous or nearby residential neighborhoods, and the nearest residences are located 0.15 to 0.65 miles to the east. Therefore, the Project will not physically divide an established community. No further discussion of this issue will be required in the EIR.

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?*

**Potentially Significant Impact**

The Project includes a General Plan Amendment (GPA) to redesignate the site from RL to Limited Industrial (LI), and concurrent Zoning Amendment to redesignate the site from Rural Living (RL-10) to Community Industrial (IC), and a Conditional Use Permit (CUP) to allow for the construction and operation of the proposed warehouse and distribution facilities. The EIR must analyze whether, or to what extent this new land use designation would impact the goals, policies and programs of the General Plan and the standards of the Development Code. If necessary, the EIR will need to consider mitigation measures to reduce identified impacts to less than significant levels.

**For question XI.a, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Project impacts for question XI.b will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **XII.** | **MINERAL RESOURCES** - Would the project: | | | | |
| a) | Result in the loss of availability of a known mineral resource that will 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:*** *(Check ☐ if project is located within the Mineral Resource Zone Overlay):*

***Countywide Plan; Submitted Project Materials***

a) *Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?*

**No Impact**

The Project site is currently undeveloped. Policy NR-6.1 of the Countywide Plan states that the development of land that would substantially preclude the future development of mining facilities in areas classified as Mineral Resource Zone (MRZ) 2a, 2b, or 3a is prohibited or discouraged. According to the Countywide Plan Policy Map NR-4, *Mineral Resource Zone*, there are no MRZ 2a, 2b, or 3a within the vicinity of the Project site, and there are no known State mineral resource zones or locally important mineral resource recovery site on the Project site. Therefore, there would be no loss of a known mineral resource, and no impact would occur. No further discussion of this issue will be required in the EIR.

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?*

**No Impact**

The Project site is not identified as a locally important mineral resource recovery site. The Project site is undisturbed, and no history of mineral mining is present on the site. The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur, and no further discussion of this issue will be required in the EIR.

**For all questions under XII, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **XIII.** | **NOISE** - Would the project result in: | | | | |
| a) | Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☐ | ☒ | ☐ |
| b) | Generation of excessive 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:*** *(Check if the project is located in the Noise Hazard Overlay District ☐ or is subject to severe noise levels according to the General Plan Noise Element ☐):*

***Countywide Plan; Submitted Project Materials***

a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards*

**Less Than Significant Impact**

Construction of the Project will result in site preparation, grading, excavation, construction, paving, and related activities. Construction will result in localized and temporary increases in ambient noise levels and may impact sensitive receptors. According to the San Bernardino County Code §83.01.080(g)(3), temporary construction noise is exempt from the County noise standards provided it occurs between 7:00 a.m. and 7:00 p.m., except on Sundays and Federal holidays. These restrictions, muffling of construction equipment, and other measures will reduce, to some extent, construction noise impacts on surrounding land uses. Impacts will be temporary and will end once construction is complete. The nearest sensitive receptors adjacent to or near the subject property are single family residences located approximately 850 feet east. The forthcoming EIR will analyze construction-related noise impacts.

Long-term operation of the various Project components will result in permanent and intermittent sources of increased ambient noise in the surrounding area. However, proposed land uses are generally consistent with the proposed urban commercial and residential environment, and noise sources are expected to be similar to those already operating in the surrounding area.

New Project-related noise sources are expected to include vehicle traffic, industrial and other loading areas, mechanical equipment such as heating, ventilation, and air conditioning (HVAC) units, loading and unloading operations, and parking lot activities. The forthcoming EIR will analyze operation-related noise impacts.

b) *Generation of excessive groundborne vibration or groundborne noise levels?*

**Less than Significant Impact**

Excessive vibration during construction occurs only when high vibration equipment (i.e., compactors, large dozers, or pile drivers) are operated. The proposed Project may require limited use of equipment with high vibration levels during construction. The EIR will analyze the equipment to be used, and assure that impacts associated with the temporary use of this equipment does not cause significant levels of vibration.

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?*

**No Impact**

The Project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the Barstow-Dagget Airport, located 5± miles southeast of the Project site. Therefore, the airport's operation is not expected to raise safety hazards or excessive noise concerns in the Project area. No impact will occur, and no further discussion will be included in the EIR.

**For question XIII.c, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Project impacts for all other questions will be fully analyzed in the forthcoming EIR.**

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

***SUBSTANTIATION:***

***Countywide Plan; Submitted Project Materials.***

a) *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**Potentially Significant Impact**

The Project proposes the development of 1.76 million square feet of industrial warehouse and distribution facilities. The Project's implementation is expected to provide local jobs to the community of Yermo and other jurisdictions and communities within San Bernardino County. However, the Project's development in a less populated area may induce unplanned population growth as new employees relocate to work at the site. The EIR will calculate the number of potential employees and compare this job creation to projected growth, based on SCAG and other predictors for future population and housing in the community of Yermo and the region.

The Project is located immediately south of the I-15 and is also bound by Yermo Road. The Project will result in internal and area circulation, as well as right-of-way and driveway improvements along Yermo Road. Apart from required right-of-way improvements, the Project does not propose extensive off-site roadway expansions or other improvements that would facilitate the development of other sites. As such the development would have no effect in the area's urban growth. Nonetheless, the forthcoming EIR will analyze potential impacts and determine if less than significant impact is indeed the case.

b) *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**No Impact**

The Project site is vacant. No residential structures currently exist within the Project boundaries. The Project will not cause the displacement of existing people or housing. For this reason, no impact will occur, and no further discussion of this topic will be required in the EIR.

**For question XIV.b, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Project impacts for question XIV.a will be fully analyzed in the forthcoming EIR.**

| | *Issues* | *Potentially Significant Impact* | *Less than Significant with Mitigation Incorporated* | *Less than Significant* | *No Impact* |
|---|---|---|---|---|---|
| **XV.** | **PUBLIC SERVICES** | | | | |
| a) | Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| | Fire Protection? | ☐ | ☐ | ☒ | ☐ |
| | Police Protection? | ☐ | ☐ | ☒ | ☐ |
| | Schools? | ☐ | ☐ | ☒ | ☐ |
| | Parks? | ☐ | ☐ | ☒ | ☐ |
| | Other Public Facilities? | ☐ | ☐ | ☒ | ☐ |

***SUBSTANTIATION:***

***Countywide Plan; Submitted Project Materials***

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:* ***Note: Substantiate*** *and Pull down the tab where it says "****No Impact"*** *and indicate if the project will have* ***No Impact,*** **Less than Significant Impact**, **Less than Significant with Mitigation, Significant Impact**, **Substantially Mitigated by Uniformly Applicable Development Policies, Analyzed in the Prior EIR.**

***Fire Protection?***

**Less Than Significant Impact**

The Yermo-Calico Fire Department provides fire protective services to the area and the project site. The nearest fire station to the site is located at 38321 East Yermo Road, approximately 2.45 miles east of the project site. The forthcoming EIR will analyze the Project's possible level of demand for service and determine whether mitigations are necessary to ensure sufficient personnel and facilities service the Project. Less than significant impacts are anticipated, and the EIR will further analyze this issue.

***Police Protection?***

**Less Than Significant Impact**

The San Bernardino County Sheriff's Department (SBCSD) provides police protection services to the area, including the project site. The nearest SBCSD patrol station to the project site is located at 225 E. Mountain View Street in Barstow, approximately 8.5

miles southwest of the project site. Development of the vacant site will marginally increase the need for police service. Impacts associated with increased demand for future police services are expected to be less than significant, and will be analyzed in the EIR.

***Schools?***

**Less Than Significant Impact**

The project site is located within the boundaries of the Silver Valley Unified School District (SVUSD), Area 1. The nearest school to the project site is Silver Valley High School, located at 35484 Daggett-Yermo Road, approximately 0.5 miles southwest of the project site.

The proposed Project is an industrial development with no residential uses that would not directly generate school-aged children requiring a public education. However, the 1.76 million square feet of industrial space may induce unplanned population growth through job creation. Although the Project is not expected to draw a substantial number of new residents to the project area that would indirectly generate school-aged students, potential impacts will be further analyzed in the forthcoming EIR.

***Parks?***

**Less Than Significant Impact**

Refer to the discussion in Section XVI, Recreation.

***Other Public Facilities?***

**Less Than Significant Impact**

The forthcoming EIR will analyze the Project's possible level of demand for other services and determine whether mitigation is necessary to ensure sufficient personnel and facilities service to the Project. Less than significant impacts are anticipated, and the EIR will further analyze this issue.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **XVI.** | **RECREATION** | | | | |
| a) | Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will 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:***

***Countywide Plan; Submitted Project Materials***

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 will occur or be accelerated?*

**Less Than Significant Impact**

The nearest park to the project site is the Peggy Sue's Diner-Saur Park located at 35654 Yermo Road, located approximately 0.25 miles west of the project site. The proposed Project is an industrial development with no residential uses that would directly induce population growth and increase the demand for recreational services. However, the 1.76 million square feet of industrial space may induce unplanned population growth through job creation. Although Project implementation is not expected to result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, potential impacts will be further analyzed in the forthcoming EIR.

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?*

**Less than Significant Impact**

The proposed Project would allow construction of a 1.76 million square feet of industrial warehouse and distribution space. The Project does not include recreational facilities and would not induce population growth that would result in increased demand for recreational facilities. However, the 1.76 million square feet of industrial space may induce unplanned population growth through job creation. Although impacts associated with parks are expected to be less than significant, potential impacts will be further analyzed in the forthcoming EIR.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **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) | Would the project 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 intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☐ | ☒ |
| d) | Result in inadequate emergency access? | ☐ | ☐ | ☐ | ☒ |

***SUBSTANTIATION:***

***Countywide Plan; Submitted Project Materials***

a) *Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

**Potentially Significant Impact**

According to the County's Transportation Impact Study Guidelines (July 2019), any signalized study intersection in the Desert region that is operating at an LOS C or better without project traffic in which the addition of project traffic causes the intersection to degrade to an LOS D, E, or F shall identify improvements to improve operations to LOS C. The proposed Project is anticipated to generate substantial traffic, and it is currently uncertain whether and to what extent the Project could conflict with the County's Transportation and Mobility Element and related policies and implementing ordinances addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. A Project-specific traffic impact report will be prepared in which the vehicle trip generation will be quantified, and LOS will be determined for each Project-related interchange. The EIR will summarize the report, determine whether the Project exceeds the County's LOS standard, determine whether the Project will conflict with regulations addressing alternative transportation facilities, and if so, set forth feasible mitigation measures to reduce potential impacts to less than significant levels.

b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?*

**Potentially Significant Impact**

It is currently uncertain whether and to what extent the Project could be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) considering the Project is expected to increase local and regional traffic. The extent to which the Project conflicts with CEQA Guideline section 15064.3, subdivision (b) with regard to vehicle miles of traveled (VMT) it could generate is currently unknown. A traffic impact report and VMT study are being prepared that will quantify the Project's VMT generation and its impact on the County's VMT policy. The EIR will further discuss this issue.

c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

**No Impact**

The site will be accessed from three (3) driveways along Yermo Road, each providing both ingress and egress. Buildings and on-site parking will be accessed via internal drive aisles. Review of the proposed improvements to County and internal roadways does not indicate any meaningful potential for the Project to increase hazards associated with roadway geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Per the County Department of Public Works Traffic Division, the Project shall be designed in accordance with the latest American Association of State Highway and Transportation Officials (AASHTO) design manual to accommodate safe and proper turning movements. The types of vehicles accessing the site, including employee vehicles and large trailer trucks, would be consistent with the commercial and industrial (military) uses currently utilizing adjacent roadways. Vehicles accessing the site are not expected to increase hazards or create a dangerous intersection, because the County will condition the Project to build its access to County standards. No incompatible uses are proposed, and no project-related impact is anticipated. No further discussion of this issue is required in the EIR.

d) *Result in inadequate emergency access?*

**No Impact**

The proposed Project does not involve a use or activity that could interfere with long-term emergency response or emergency evacuation plans for the area. Project operation would not change any existing roads, including areas provided for emergency access. Prior to construction, both the Fire Department and Sheriff Department will review the Project site plan to ensure safety measures are addressed, including emergency access. Development of the site is subject to requirements of the Title 24 Building Code and Fire Code. During construction adequate access for emergency vehicles must be maintained, as required by the County, including implementation of a traffic management plan to coordinate the high volume of truck trips for construction equipment and building material deliveries, ensuring that hauling and other truck traffic does not impede access along surrounding roadways.

The County updated its adopted Emergency Operations Plan (EOP) in 2018. Given that the Project will not interfere with the local evacuation route and will comply with the local plan review and state fire code, the Project will have no impacts to the implementation of the adopted EOP or any other adopted emergency evacuation plans. No impact will occur, and no further discussion will be included in the EIR.

**For question XVII.c and d, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Project impacts for all other questions will be fully analyzed in the forthcoming EIR.**

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

***SUBSTANTIATION:***

***Countywide Plan; Submitted Project Materials***

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

*i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*

*ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**Less than Significant with Mitigation**

The Project site is currently vacant, and no historic structures occur on the property. Archaeological resources listed on state and/or national registers are found in all four geographic regions of the county, with most located within the North Desert Region

where the Project site is located. Although the Project site is not known to harbor archaeological resources, a cultural (historic and archaeological) resources survey and report are being prepared for the proposed Project and its findings will be incorporated into the forthcoming EIR.

The County will conduct SB 18 and AB 52 Tribal Consultations to involve local Tribes in the Project and include their concerns in the EIR. The forthcoming EIR will summarize the report and, in consultation with local tribes, will determine the potential for impacts, and if necessary, will set forth effective mitigation measures.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **XIX.** | **UTILITIES AND SERVICE SYSTEMS -** Would the project: | | | | |
| a) | Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| 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:***

***Countywide Plan; Submitted Project Materials***

a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

**Less than Significant**

Water
The Project proposes to drill a private on-site well that will be overseen by the County's Environmental Health Services (EHS) department to ensure compliance with local ordinances and California Water Well Standards. The location, and construction and operational impacts of the proposed on-site water well will be further clarified and evaluated in the forthcoming EIR.

Wastewater
The Project proposes the installation of onsite septic tanks with leach lines, which will require review by County Public Health, Environmental Health Services to determine if the Project would exceed wastewater treatment requirements of the Lahontan Regional Water Quality Control Board. The location and Project impacts of the proposed onsite septic facilities will be further clarified and evaluated in the forthcoming EIR.

Stormwater
The Project site appears to be generally flat and in an area that receives relatively low levels of annual and 100-year rainfall. The County requires the preparation of a hydrology study to analyze and design the on-site flood control system, which would include on-site detention basins to collect, detain, and infiltrate stormwater flows. The EIR will review the design of the flood control system, and assure that impacts are less than significant, or impose mitigation measures if necessary to assure that neither storm flows nor erosion impact off-site properties or receiving waters.

Electric Power, Natural Gas, Telecommunications
Electric power is provided by SCE and natural gas is provided by Southwest Gas. Telecommunications are provided by Verizon and cable by Time Warner Cable. The location of utilities near the site, their potential extension to serve the Project, and the need for constructing or relocating facilities, which could have significant environmental impacts, are currently unknown. The forthcoming EIR will quantify the demand and determine whether service extensions that could cause significant environmental impacts will be required.

b) *Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?*

**Potentially Significant Impact**

The Project water demand is unknown. A Water Supply Assessment (WSA) will be prepared to identify Project water demand on a daily and yearly basis. The findings of the WSA will be summarized in the EIR and if required, mitigation measures will be set forth in the EIR.

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?*

**Less than Significant**

Refer to Section XIX a, above.

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?*

**Less than Significant**

The Project is expected to generate solid waste during construction and operation. Burrtec Waste Industries, Inc. provides solid waste collection services to the community of Yermo, including the Project site. Burrtec Inc. is responsible for operating within federal, state, and local standards and regulations regarding the management of solid waste. The California Green Building Standards Code (CALGreen) mandates that at least 65% of nonhazardous construction waste from new construction be recycled and/or salvaged for reuse. Once operational, the Project may generate waste including packaging materials like cardboard and plastic, wooden pallets, food waste from employee break areas, and general office waste such as paper and printer cartridges. The forthcoming EIR will quantify the estimated Project solid waste generation, evaluate available landfill capacity, and determine if impacts would be less than significant.

e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

**Less than Significant**

State, County, and local agencies with regulatory authority related to solid waste include the California Department of Resources Recycling and Recovery, and San Bernardino County. As previously stated, Burrtec Waste Industries, Inc. provides solid waste collection services to the community of Yermo, including the Project site. Burrtec Inc. is responsible for operating within federal, state, and local standards and regulations regarding the management of solid waste. The Project shall comply with the CALGreen mandate that at least 65% of nonhazardous construction waste from new construction be recycled and/or salvaged for reuse. Once operational, the Project may generate waste including packaging materials like cardboard and plastic, wooden pallets, food waste from employee break areas, and general office waste such as paper and printer cartridges. The collection and disposal of solid waste will conform to applicable federal, State, and local plans and regulations, including AB 939 (Integrated Waste Management Act) that local jurisdictions divert at least 50 percent of all solid waste. It is expected the proposed Project would have a less than significant impact in terms of complying with federal, state, and local statutes and regulations related to solid waste. This issue will be analyzed, and to the extent possible quantified in the EIR.

**Project impacts will be fully analyzed in the forthcoming EIR.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **XX.** | **WILDFIRE:** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) | Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| b) | Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☐ | ☒ |
| c) | Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, 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:***
***Countywide Plan; Submitted Project Materials***

a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

**No Impact**

The County updated its adopted Emergency Operations Plan (EOP) in 2018. Given that the Project will not interfere with the local evacuation route and will comply with the local plan review and state fire code, the Project will have no impacts to the implementation of the adopted EOP or any other adopted emergency evacuation plans.

According to County map HZ-6, *Fire Responsibility Areas*, the Project site is located in a Local Responsibility Area (LRA) meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a Local agency, which is the County. The Project site is located in a Moderate Fire Hazard Severity according to County map HZ-5, Fire Hazard Severity Zones, and in the California Department of Fire and Forestry, 2025 Fire Hazard Severity Zones in State Responsibility Zone Map, as recommended by the Fire Marshall.

Potential impacts would occur if the Project were located in or near state responsibility areas (SRA) or lands classified as very high fire hazard severity zones. As described above, the Project is not located in or near an SRA or an area considered to be at high or very high risk from wildland fires. Therefore, the Project would have no impacts with regard to Section II. Wildfires, and no further discussion will be included in the EIR.

b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?*

**No Impact**

The project site is generally flat and does not support areas of steep slopes. In addition, the project site is located within an urbanizing area of the County, adjacent to the I-15, Yermo Road, and Marine Corps Logistics Base, where the risk of wildland fire is decreased. The Project is not located in an area considered to be at high risk from wildland fires, and the Project will be subject to state and local fire codes to minimize potential impacts related to fires. The Project is not expected to create a significant exposure threat to occupants or surrounding receptors to pollutant concentrations from a wildfire.

Potential impacts would occur if the Project were located in or near SRA or lands classified as very high fire hazard severity zones. As described above, the Project is not located in or near an SRA or an area considered to be at high or very high risk from wildland fires. Therefore, the Project would have no impacts with regard to Section II. Wildfires, and no further discussion will be included in the EIR.

c) *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

**No Impact**

The Project will be responsible for onsite improvements and maintenance, and the extension of utility infrastructure as necessary. In addition, the Project would adhere to current Title 24 building codes and any conditions included through review by the fire department. Given that the Project will comply with the local plan review and state fire code, the Project will not exacerbate fire risks that may result in environmental impacts.

Potential impacts would occur if the Project were located in or near SRA or lands classified as very high fire hazard severity zones. As described above, the Project is not located in or near an SRA or an area considered to be at high or very high risk from wildland fires. Therefore, the Project would have no impacts with regard to Section II. Wildfires, and no further discussion will be included in the EIR.

d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

**No Impact**

The project site does not include any downslopes and project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Potential impacts would occur if the Project were located in or near SRA or lands classified as very high fire hazard severity zones. As described above, the Project is not located in or near an SRA or an area considered to be at high or very high risk from wildland fires. Therefore, the Project would have no impacts with regard to Section II. Wildfires, and no further discussion will be included in the EIR.

**For all questions under XX, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.**

| | Issues | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant | No Impact |
|---|---|---|---|---|---|
| **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? | ☒ | ☐ | ☐ | ☐ |

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?*

**Potentially Significant with Mitigation**

As discussed in Section IV (Biological Resources), the development of an industrial park on existing undeveloped, desert terrain has the potential to impact the natural environment including federal, state, and locally protected species. A Biological Assessment will be conducted to determine the Project's impacts on biological resources. The forthcoming EIR will analyze potential impacts to biological resources in greater detail and set forth mitigation measures to ensure that impacts are less than significant.

As per the discussion in Section V (Cultural Resources) and Section XVIII (Tribal Cultural Resources), a cultural (historic and archaeological) resources survey and report are being prepared for the proposed Project and its findings will be incorporated into the forthcoming EIR. The County will conduct SB 18 and AB 52 Tribal Consultations to involve local Tribes in the Project and include their concerns in the EIR. The forthcoming EIR will summarize the report and, in consultation with local tribes, will determine the potential for impacts, and if necessary, will set forth effective mitigation measures.

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)?*

**Potentially Significant Impact**

Based on the discussion in Section III (Air Quality) and Section VIII (Greenhouse Gas Emissions), it is currently unknown if the Project's buildout will exceed MDAQMD significance thresholds for criteria air pollutant and GHGs. An air quality and greenhouse gas emission report will be prepared to quantity the Project's emissions. The forthcoming EIR will summarize the report and determine if the environment issues will constitute a significant Project impact or a substantial cumulative impact.

Exceedance of thresholds may also occur in transportation and hydrology, as discussed in Section XVII and Section X, respectively. Given the nature of the development, the Project is capable of generating a high volume of vehicle trips. Vehicle trip generation is currently unknown. A Project-specific traffic report will be prepared in which the vehicle trip generation is quantified, and level of service is determined, and VMT impacts are assessed per County guidelines. These traffic analyses will inform the EIR and allow for the thorough evaluation of potential transportation impacts.

Additionally, a WSA is required to quantify the Project's annual water demand and its impacts on current and future groundwater availably and sustainability in the region. The WSA will inform the EIR and allow for the thorough evaluation of potential impacts to groundwater availability.

c) *Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?*

**Potentially Significant Impact.**

The Project will generate air pollutants, greenhouse gas emissions, and traffic, among other potential environmental impacts. It is unknown whether or to what extent these factors will significantly impact, directly or indirectly, nearby residents or employees. The forthcoming EIR will analyze these issues and determining whether impacts to humans will be substantially significant. Further discussion will be provided.

## GENERAL REFERENCES

County of San Bernardino, Countywide Plan. Adopted July 2020. https://countywideplan.sbcounty.gov/.

County of San Bernardino, Yermo Community Action Guide (August 2020), https://countywideplan.com/community/north-desert-unincorporated/yermo/.

County of San Bernardino, San Bernardino County Emergency Operations Plan (January/February 2018), https://www.sbcounty.gov/uploads/SBCFire/documents/OES/2018_EOP_Update.pdf.

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Mojave Desert Air Quality Management District, MDAQMD 2004 State and Federal Ozone Attainment Plan, https://www.mdaqmd.ca.gov/home/showpublisheddocument/174/636305689540670000.

Mojave Desert Air Quality Management District, MDAQMD Rule Book, https://www.mdaqmd.ca.gov/rules/rule-book (accessed March 2023).

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