SUN MESA SELF-STORAGE FACILITY
(APN 0597-111-67-0000)

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION (IS/MND)

CEQA Analysis Prepared for:

Jared Jerome, Associate Planner

Town of Yucca Valley

Community Development Department
58928 Business Center Drive
Yucca Valley, CA 92284
Telephone: 760-369-6579 X317
FAX: 760/228-0084

Prepared by:

UltraSystems Environmental Inc.
16431 Scientific Way
Irvine, CA 92618-4355
Telephone: 949-788-4900
FAX: 949/788-4901

January 2026

Project No. 7335

This page is left intentionally blank.

PROJECT INFORMATION SHEET

1. Project Title	Sun Mesa Self-Storage Facility
2. CEQA Lead Agency	**Town of Yucca Valley** Community Development Department 58928 Business Center Drive Yucca Valley, CA 92284 Jared Jerome, Associate Planner (760) 369-6579 x317 jjerome@yucca-valley.org
3. Project Applicant	Rob Billings 5024 Wallaby Street Yucca Valley, CA (760) 686-4171 billingstransfer@yahoo.com
4. Project Location	S/E Corner of Sun Mesa Drive and Newton Lane Yucca Valley, California
5. Assessor's Parcel Numbers	APN 0597-111-67
6. Project Site General Plan Designation(s)	Current: Industrial (I)
7. Project Site Zoning Designation(s)	Current: Industrial (I)
8. Surrounding Land Uses and Setting	Residential property and auto repair facility located to the south of the project site. To the west, there is a debris storage and vacant gravel lot by Newton Lane. There is undeveloped land located north and east of the project site.
9. Description of Project	The proposed project entails the construction and operation of a self-storage facility, consisting of 16 detached storage structures, totaling approximately 89,700 square feet, plus a 400 square foot manager's office. Public infrastructure improvements as part of project implementation would include paving 26 feet wide(approximately half width) along Sun Mesa Drive and Newton Lane with curb, gutter, and sidewalk, from the proposed project site south to Buena Vista Drive. Refer to **Section 3.0** of this document for additional information. The project applicant is requesting the following discretionary actions, which are discussed in detail in **Section 3.0** of this document: • Site Plan Review • Design Review

10. Selected Agencies whose Approval is Required	Town of Yucca Valley
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, has consultation begun?	Letters were sent by the Town of Yucca Valley (the Lead Agency), to local Native American tribes asking if they wished to participate in AB 52 consultation concerning the proposed project in the Town of Yucca Valley. Tribes had up to 30 days in which to respond to notification of the project. For the proposed project, those tribe(s) that requested consultation were contacted by the Town per Public Resources Code § 21074. The Twenty-Nine Palms Band of Mission Indians indicated that the project is within the Tribes Traditional Use Area, but no known cultural resources are located within the project's APE and there exists the possibility of surface or buried materials on the site and asks that the specific conditions for all cultural resources on any development plans be included. The Yuhaaviatam of San Manuel Nation requested consultation and provided a series of measures that are included as Mitigation Measures in this document. The Agua Caliente Band of Cahuilla Indians indicated that the project area is not located within the boundaries of the ACBCI Reservation, but it is within the Tribe's Traditional Use Area and due to this provided Mitigation Measures for the project that are included in this document. The Morongo Band of Mission Indians indicated that the project is within the ancestral territory of the tribe and request consultation and indicated that tribal monitoring is recommended. No consultation occurred. Consultation has been concluded.
12. Other Public Agencies	Agencies that will review the proposed project include the following: • Regional Water Quality Control Board, Colorado River Basin Region • California Department of Fish and Wildlife • U.S. Environmental Protection Agency • U.S. Army Corps of Engineers • Mojave Desert Air Quality Management District

TABLE OF CONTENTS

Executive Summary ..... **ix**
ES.4 Project Synopsis ix
ES.5 Summary of Significant Effects ix
ES.6 Project Objectives x
ES.7 Areas of Controversy Known to the Lead Agency x
ES.10 Summary of Environmental Impacts and Mitigation Measures x

1.0 Introduction **1-1**
1.1 Proposed Project 1-1
1.2 Lead Agencies – Environmental Review Implementation 1-1
1.3 CEQA Overview 1-1
1.4 Purpose of Initial Study 1-2
1.5 Review and Comment by Other Agencies 1-3
1.6 Impact Terminology 1-4
1.7 Organization of Initial Study 1-4
1.8 Findings from the Initial Study 1-5

2.0 Environmental Setting **2-1**
2.1 Project Location 2-1
2.2 Project Setting 2-1
2.3 Existing Characteristics of the Site 2-6

3.0 Project Description **3-1**
3.1 Project Background 3-1
3.2 Project Overview 3-1
3.3 Proposed Project Features 3-3
3.4 Construction Activities 3-10
3.5 Discretionary Actions 3-10

4.0 Environmental Checklist **4-1**
4.1 Aesthetics 4.1-1
4.2 Agriculture and Forestry Resources 4.2-1
4.3 Air Quality 4.3-1
4.4 Biological Resources 4.4-1
4.5 Cultural Resources 4.5-1
4.6 Energy 4.6-1
4.7 Geology and Soils 4.7-1
4.8 Greenhouse Gas Emissions 4.8-1
4.9 Hazards and Hazardous Materials 4.9-1
4.10 Hydrology and Water Quality 4.10-1
4.11 Land Use and Planning 4.11-1
4.12 Mineral Resources 4.12-1
4.13 Noise 4.13-1
4.14 Population and Housing 4.14-1
4.15 Public Services 4.15-1
4.16 Recreation 4.16-1
4.17 Transportation 4.17-1

4.18 Tribal Cultural Resources 4.18-1
4.19 Utilities and Service Systems 4.19-1
4.20 Wildfire 4.20-1
4.21 Mandatory Findings of Significance 4.21-1

5.0 References 5-1

6.0 List of Preparers 6-1
6.1 CEQA Lead Agency 6-1
6.2 Project Applicant 6-1
6.3 UltraSystems Environmental, Inc. 6-1

7.0 Mitigation Monitoring and Reporting Program 7-1

TABLES

Table 2.2-1 - Summary of Existing Land Use and Zoning Designations 2-6
Table 3.2-1 - Project Summary 3-1
Table 3.3-1 - Building Type Breakdown 3-3
Table 3.6-1 - Permits and Approvals 3-11
Table 4.3-1 - Federal and State Attainment Status 4.3-2
Table 4.3-2 - Ambient Air Quality Monitoring Data 4.3-5
Table 4.3-3 - MDAQMD Thresholds of Significance for Criteria Pollutants 4.3-7
Table 4.3-5 - Maximum Annual Regional Construction Emissions 4.3-8
Table 4.3-6 - Maximum Annual Project Operational Emissions 4.3-9
Table 4.6-1 - Estimated Project Operational Energy Use 4.6-2
Table 4.8-2 - Project Construction-Related GHG Emissions 4.8-10
Table 4.8-3 - Project Operational GHG Emissions 4.8-10
Table 4.10-1 - Project Site and Tributary Area Runoff Rates 4.10-2
Table 4.11-1 - Land Use Consistency Analysis 4.11-4
Table 4.13-1 - California Land Use Compatibility for Community Noise Sources 4.13-3
Table 4.17-1 - Compliance with Yucca Valley General Pan - Mobility & Transportation 4.17-4
Table 4.17-2 - Project VMT Analysis 4.17-5
Table 4.19-1 - WMWD Retail Water Supplies and Demands AFY 4.19-3
Table 4.19-2 - Landfills Serving Fontana 4.19-4
Table 7.0-1 - Mitigation Monitoring and Reporting Program 7-2

FIGURES

Figure 2.2-1 - Regional Location 2-2
Figure 2.2-2 - Project Location 2-3
Figure 2.2-3 - Topographic Map 2-4
Figure 2.2-4 - Project Site Photographs 2-5
Figure 3.2-1 - Site Plan 3-2
Figure 3.3-1 - Floor Plan 3-4
Figure 3.3-2 - Elevations 3-5
Figure 3.3-3 - Building C Elevations 3-6
Figure 3.3-4 - Color Boards 3-7
Figure 3.3-5 - Landscape Plan 3-9

Figure 4.1-1 - State Scenic Highways 4.1-3
Figure 4.2-1 - Important Farmland Categories 4.2-2
Figure 4.4-1 - Project Location and Biological Study Area (BSA) 4.4-3
Figure 4.4-2 - Joshua Tree Census 4.4-9
Figure 4.4-3 - CNDDB Known Occurrences: Plant Species and Habitats 4.4-10
Figure 4.4-5 - CNDDB Known Occurrences: Wildlife Species 4.4-12
Figure 4.4-6 - Critical Habitat 4.4-21
Figure 4.4-7 - Land Cover 4.4-22
Figure 4.4-8 - CDFW Wildlife Corridors 4.4-26
Figure 4.5-1 - Topographic Map 4.5-2
Figure 4.7-1 - Alquist Priolo Fault Zones 4.7-3
Figure 4.7-2 - Regionally Active Faults 4.7-4
Figure 4.7-3 - Landslides and Liquefaction 4.7-7
Figure 4.9-1 - Cortese List Site Map 4.9-4
Figure 4.9-2 - Airport Location Map 4.9-5
Figure 4.10-1 - USGS Waters and Watersheds 4.10-4
Figure 4.10-2 - Existing Hydrology Map 4.10-5
Figure 4.10-3 - Groundwater Basins Map 4.10-7
Figure 4.10-4 - Flood Hazard Zones Map 4.10-10
Figure 4.11-1 - General Plan Land Use Designation 4.11-2
Figure 4.11-2 - Zoning Designation 4.11-1
Figure 4.12-1 - Geothermal Wells 4.12-2
Figure 4.12-2 - Oil and Gas Wells 4.12-3
Figure 4.20-1 - Fire Hazard Severity Zone - Local Responsibility Area 4.20-2
Figure 4.20-2 - Fire Hazard Severity Zone - State Responsibility Area 4.20-3

APPENDICES

Appendix A Project Plans and Drawings
Appendix B Air Quality, Energy, and Greenhouse Gas Emissions Assessment
Appendix C1 Biological Resources Assessment
Appendix C2 Western Joshuia Tree Census
Appendix C3 Plant Survey Report
Appendix D Cultural Resources Report
Appendix E Geotechnical Report
Appendix F Phase I ESA
Appendix G1 Percolation Testing Report
Appendix G2 Drainage Study
Appendix H Noise and Vibration Assessment
Appendix I Trip Generation and VMT Analysis

ACRONYMS AND ABBREVIATIONS

Acronym/ Abbreviation	Term
AAQS	Ambient Air Quality Standards
ACM(S)	Asbestos-Containing Material(s)
AFY	Acre-Feet per Year
AIA	Airport Influence Area
AMI	Area Median Income
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
BAU	Business As Usual
BIOS	Biogeographic Information and Observation System
BWh	Dry-Hot Desert
BWhh	Dry-Very Hot Desert
CAAQS	California Ambient Air Quality Standards
CAO(S)	Cleanup And Abatement Order(s)
CASGEM	California Statewide Groundwater Elevation Monitoring
CCAA	California Clean Air Act
CDFW	California Department Of Fish and Wildlife
CDO(S)	Cease And Desist Order(s)
CFGC	California Fish and Game Code
CFS	Cubic Feet per Second
CMP	Corrugated Metal Pipe
CMPHS	CMP Highway System
CMVGWB	Copper Mountain Valley groundwater basin
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	Carbon Monoxide
CWA	Clean Water Act
DAMP	Drainage Area Management Plan
DCP	Dust Control Plan
DOSH	California Division of Safety And Health
DU/AC	Dwellling Units Per Acre
EMS	Emergency Medical Services
EO	Executive Order
ESA	Endangered Species Act
ESRL	Earth System Research Laboratory
EV	Electric Vehicle
EVCS	Electric Vehicle Charging Station
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
GIS	Geographic Information System
GPCD	Gallons Per Capita per Day

Acronym/ Abbreviation	Term
GPD	Gallons Per Day
HABS	Historic American Building Survey
HCP	Habitat Conservation Plan
HDWD	Hi-Desert Water District
HU	Hydrologic Unit
HVAC	Heating, Ventiliation and Air Conditioning
ISA	International Society of Arboriculture
ITE	Institute Of Transportation Engineers
L_{90}	Noise level that exceeded 90% of the time
LBP	Lead-Based Paint
L_{eq}	Equivalent Noise Level
LID	Low Impact Development
L_{max}	Root Mean Square Maximum Noise Level
LST(s)	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
MGD	Million Gallons per Day
MPAH	Master Plan of Arterial Highways
MS4	Municiple Separate Storm Sewer Permit
MT	Metric Tons
NAAQS	National Ambient Air Quality Standards
NAAQS	National Ambient Air Quality Standards
National Core	National Community Renaissance
NCCP	Natural Communities Conservation Plan
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
No_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
Pb	Lead
PCB	Polychlorinated Biphenyl
PM	Particulate Matter
PM_{10}	Respirable Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
PPM	Parts Per Million
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Allocation
ROG	Reactive Organic Gases
SCAB	South Coast Air Basin
SCE	Southern California Edison Company
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SoCal Gas	Southern California Gas Company

Acronym/ Abbreviation	Term
SRA(s)	Source Receptor Area(s)
SRRE	Source Reduction and Recycling Element
STIP	Statewide Transportation Improvement Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWRCB	State Water Resources Control Board
Taps	Transportation Assembly Points
TMP	Traffic Management Plan
UFPO	Urban Forest Protection Ordinance
USDA	United States Department Of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VCP	Vitrified Clay Pipe
VOC	Volatile Organic Compound
WEG	Wind Erodibility Group
Ybp	Years Before Present

Executive Summary

ES.1 Introduction

This Initial Study (IS) is intended to analyze potential impacts posed by the proposed project. The Town of Yucca Valley (Town) is the Lead Agency under the California Environmental Quality Act (CEQA) and is responsible for preparing the Initial Study for the Sun Mesa Self-Storage Facility (hereby referred to as the "proposed project" or the "project").

ES.2 Overview of the Proposed Project

The Town of Yucca Valley (Town) is processing a request to implement discretionary actions that would ultimately allow for the development of a self-storage facility, consisting of 16 detached storage structures totaling approximately 89,700 square feet plus a 400 square foot manager's office. Public infrastructure improvements would include requiring paving twenty-six (26') half width of a sixty-foot (60') wide local road along Newton Lane with curb, gutter, and sidewalk, from the proposed project site south to Buena Vista Drive (APN 0597-111-67).

ES.3 CEQA Purpose and Need

The purpose of this IS is to evaluate the potential impacts resulting from the implementation of the proposed project, including the construction and operation of the proposed self-storge facility. All "projects" within the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project in accordance with the requirements of the *California Environmental Quality Act of 1970 (CEQA).* Some projects are determined to be statutorily and categorically exempt from CEQA and no further environmental documentation is needed to be prepared for them. However, if the proposed project may create significant impacts on the environment an environmental analysis (IS/MND or EIR) must be prepared for the project.

ES.4 Project Synopsis

Location

The project site is located southeast of the intersection of Newton Lane and Sun Mesa Drive in the Town of Yucca Valley in San Bernardino County (APN: 0597-111-67).

Project Characteristics

The proposed self-storage facility is located on a parcel designated Industrial (I) in the Town of Yucca Valley General Plan and is zoned Industrial. The project does not require a General Plan Amendment or Zone Change and is subject to approval of a Site Plan Review (SPR).

ES.5 Summary of Significant Effects

As detailed in this document, after the implementation of mitigation, the project would result in less than significant environmental impacts.

ES.6 Project Objectives

Below is a list of objectives for the proposed project:

To provide construction of self-storage units and a manager's office, parking, landscaping, utility improvements, and improvement of half of Newton Lane along the project's west boundary.

ES.7 Areas of Controversy Known to the Lead Agency

The proposed project includes the removal of multiple western Joshua trees, which are currently under consideration by the California Fish & Game Commission as a candidate species under the California Endangered Species Act (CESA). The biological assessment prepared for the proposed project identifies the site as marginally suitable for desert tortoise; however, no desert tortoises were observed. The biological assessment identifies the site as habitat suitable for nesting birds. There are numerous Western Joshua Trees located on the project site and along Lomita Lane.

ES.10 Summary of Environmental Impacts and Mitigation Measures

Refer to **Section 7.0**, Mitigation Monitoring and Reporting Program (MMRP), for a MMRP table that lists impacts, mitigation measures adopted by the Town of Yucca Valley in connection with approval of the proposed project, level of significance after mitigation, responsible and monitoring parties, and the project phase in which the measures are to be implemented.

1.0 INTRODUCTION

1.1 Proposed Project

The Town of Yucca Valley (Town) is processing an application for discretionary actions that would ultimately allow for the approval and development of a proposed self-storage facility southeast of the intersection of Newton Lane and Sun Mesa Drive in the Town of Yucca Valley in San Bernardino County. Project implementation includes public infrastructure improvements from the proposed self-storage site to Buena Vista Drive, south of the project site.

1.1.1 Project Components

The proposed project would consist of:

Proposed Buildings

- Construction of 16 multi-unit metal storage structures, totaling approximately 89,700 square feet including a 400 square foot manager's office

1.1.2 Pavement of half width (26 feet) of local roads along Newton Lane and Sun Mesa Drive with curb, gutter, and sidewalk as delineated in Figure 3.2-1. Estimated Construction Schedule

Project construction would be in two phases and is estimated to start in First Quarter 2026. Phase 1, which includes half the units as well as the manager's office, would take approximately 3 to 4 months. Phase 2, which also includes offsite improvements, would take 3 to 4 months - but timing of construction start would be dependent on sales in Phase 1.

Refer to **Section 3.0 Project Description** for details.

1.2 Lead Agencies – Environmental Review Implementation

The Town of Yucca Valley is the Lead Agency for the proposed project. Pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations,[1] the Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment.

1.3 CEQA Overview

1.3.1 Purpose of CEQA

All discretionary projects within California are required to undergo environmental review under CEQA. A Project is defined in CEQA Guidelines § 15378 as the whole of the action having the potential to result in a direct physical change or a reasonably foreseeable indirect change to the environment and is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities, clearing or grading of land, improvements to existing

1 Public Resources Code §§ 21000 - 21177 and California Code of Regulations Title 14, Division 6, Chapter 3.

public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements.

- An activity undertaken by a person which is supported in whole or in part through public agency contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

CEQA Guidelines § 15002 lists the basic purposes of CEQA as follows:

- Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities.

- Identify the ways that environmental damage can be avoided or significantly reduced.

- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures (MMs) when the governmental agency finds the changes to be feasible.

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

1.3.2 Authority to Mitigate under CEQA

CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. Under CEQA Guidelines § 15041 a Lead Agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus"[2] and "rough proportionality"[3] standards.

CEQA allows a Lead Agency to approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant effect. In such cases, the Lead Agency must specifically identify expected benefits and other overriding considerations from the project that outweigh the policy of reducing or avoiding significant environmental impacts of the project.

1.4 Purpose of Initial Study

The CEQA process begins with a public agency making a determination as to whether the project is subject to CEQA at all. If the project is exempt, the process does not need to proceed any farther. If the project is not exempt, the Lead Agency takes the second step and conducts an Initial Study to determine whether the project may have a significant effect on the environment.

2 A nexus (i.e., connection) must be established between the mitigation measure and a legitimate governmental interest.
3 The mitigation measure must be "roughly proportional" to the impacts of the Project.

The purposes of an Initial Study as listed in § 15063(c) of the CEQA Guidelines are to:

- Provide the Lead Agency with information necessary to decide if an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) should be prepared.
- Enable a Lead Agency to modify a project to mitigate adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND or MND.
- Assist in the preparation of an EIR, if required, by focusing the EIR on adverse effects determined to be significant, identifying the adverse effects determined not to be significant, explaining the reasons for determining that potentially significant adverse effects would not be significant, and identifying whether a program EIR, or other process, can be used to analyze adverse environmental effects of the project.
- Facilitate an environmental assessment early during project design.
- Provide documentation in the ND or MND that a project would not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine if a previously prepared EIR could be used for the Project.

In cases where no potentially significant impacts are identified, the Lead Agency may issue a ND, and no MMs would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that MMs would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare an MND for the proposed project. If the Lead Agency determines that individual or cumulative effects of the proposed project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an EIR to further analyze these impacts.

1.5 Review and Comment by Other Agencies

Other public agencies are provided the opportunity to review and comment on the IS/MND. Each of these agencies is described briefly below.

- A Responsible Agency (14 CCR § 15381) is a public agency, other than the Lead Agency, that has discretionary approval power over the Project, such as permit issuance or plan approval authority.
- A Trustee Agency[4] (14 CCR § 15386) is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California.
- Agencies with Jurisdiction by Law (14 CCR § 15366) are any public agencies who have authority (1) to grant a permit or other entitlement for use; (2) to provide funding for the project in question; or (3) to exercise authority over resources which may be affected by the

4 The four Trustee Agencies in California listed in CEQA Guidelines § 15386 are California Department of Fish and Wildlife, State Lands Commission, State Department of Parks and Recreation, and University of California.

project. Furthermore, a city or county will have jurisdiction by law with respect to a project when the city or county having primary jurisdiction over the area involved is: (1) the site of the project; (2) the area in which the major environmental effects will occur; and/or (3) the area in which reside those citizens most directly concerned by any such environmental effects.

1.6 Impact Terminology

The following terminology is used to describe the level of significance of potential impacts:

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular environmental threshold in any way.
- An impact is considered ***less than significant*** if the analysis concludes that the project would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that the project would cause no substantial adverse change to the environment with the inclusion of environmental commitments, or other enforceable measures, that would be adopted by the lead agency.
- An impact is considered ***significant and unavoidable*** if the analysis concludes that the project could have a substantial adverse effect on the environment and cannot be mitigated to a less than significant level..

1.7 Organization of Initial Study

This document is organized to be consistent with the requirements under CEQA Guidelines § 15063(d), and includes the following sections:

- **Section 1.0 - Introduction**, which identifies the purpose and scope of the IS/MND.
- **Section 2.0 - Environmental Setting**, which describes location, existing site conditions, land uses, zoning designations, topography, and vegetation associated with the project site and surroundings.
- **Section 3.0 - Project Description**, which provides an overview of the project, a description of the proposed development, project phasing during construction, and discretionary actions for project approval.
- **Section 4.0 - Environmental Checklist**, which presents checklist responses for each resource topic to identify and assess impacts associated with the proposed project, and proposes MMs, as needed, to reduce potential environmental impacts to less than significant.
- **Section 5.0 - References**, which includes a list of documents cited in the IS/MND.
- **Section 6.0 - List of Preparers**, which identifies the primary authors and technical experts that prepared the IS/MND.

Technical studies and other documents, which include supporting information or analyses used to prepare the IS/MND, are included in the following appendices:

Appendix A	Project Plans and Drawings
Appendix B	Air Quality, Energy, and Greenhouse Gas Emissions Assessment
Appendix C1	Biological Resources Assessment
Appendix C2	Western Joshuia Tree Census
Appendix C3	Rare Plant Survey Report
Appendix D	Cultural Resources Report
Appendix E	Geotechnical Report
Appendix F	Phase I ESA
Appendix G1	Percolation Testing Report
Appendix G2	Drainage Study
Appendix H	Noise and Vibration Assessment

1.8 Findings from the Initial Study

1.8.1 No Impact or Impacts Considered Less than Significant

Based on IS findings, the project would have no impact or a less than significant impact on the following environmental categories listed from Appendix G of the CEQA Guidelines.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems
- Wildfire

1.8.2 Impacts Considered Less than Significant with Mitigation Measures

Based on IS findings, the project would have a less than significant impact on the following environmental categories listed in Appendix G of the CEQA Guidelines when proposed MMs are implemented.

- Biological Resources
- Cultural Resources
- Geology and Soils
- Tribal Cultural Resources
- Mandatory Findings of Significance

2.0 ENVIRONMENTAL SETTING

2.1 Project Location

The approximately 4.34-acre project site is located at the southeast corner of Sun Mesa Drive and Newton Lane within the northern portion of the Town of Yucca Valley in San Bernardino County. The site lies in a transitional area between established commercial and industrial uses along Old Woman Springs Road (SR-247), and largely undeveloped parcels to the north and east. The project's location provides convenient access to the regional roadway network, including SR-247 approximately 0.15 mile to the west and State Route 62 (SR-62) located approximately 3.11 miles south, both of which function as primary regional corridors through the Morongo Basin.

Refer to **Figure 2.1-1**, which illustrates the project's position within the broader regional context, including nearby transportation routes, community boundaries, and major natural features such as the San Bernardino Mountains to the southwest and the Mojave Desert to the north and east. **Figure 2.1-2** provides an aerial view of the project site and surrounding lands. As shown, the site is vacant with sparse desert vegetation and is bordered by existing commercial development to the south and west, with undeveloped residential -zoned parcels immediately north and east. The aerial photo also highlights the site's rectangular configuration, its frontage along Newton Lane and Sun Mesa Drive, and the absence of existing structures or utilities on the property.

2.2 Project Setting

The project site consists of one legal parcel, identified as Assessor's Parcel Number (APN) 0597-111-67. The entire 4.34-acre property is currently undeveloped and contains no existing structures, utilities, or previous site improvements. Vegetation includes 98 western Joshua trees – both living and dead – (LSA, 2023) and sparse desert scrub typical of the High Desert region. There is evidence of prior disturbance that appears to be limited to fault trenching that may have been conducted in January 2006, for which results were not recorded with the County (Google Earth Pro, 2025).

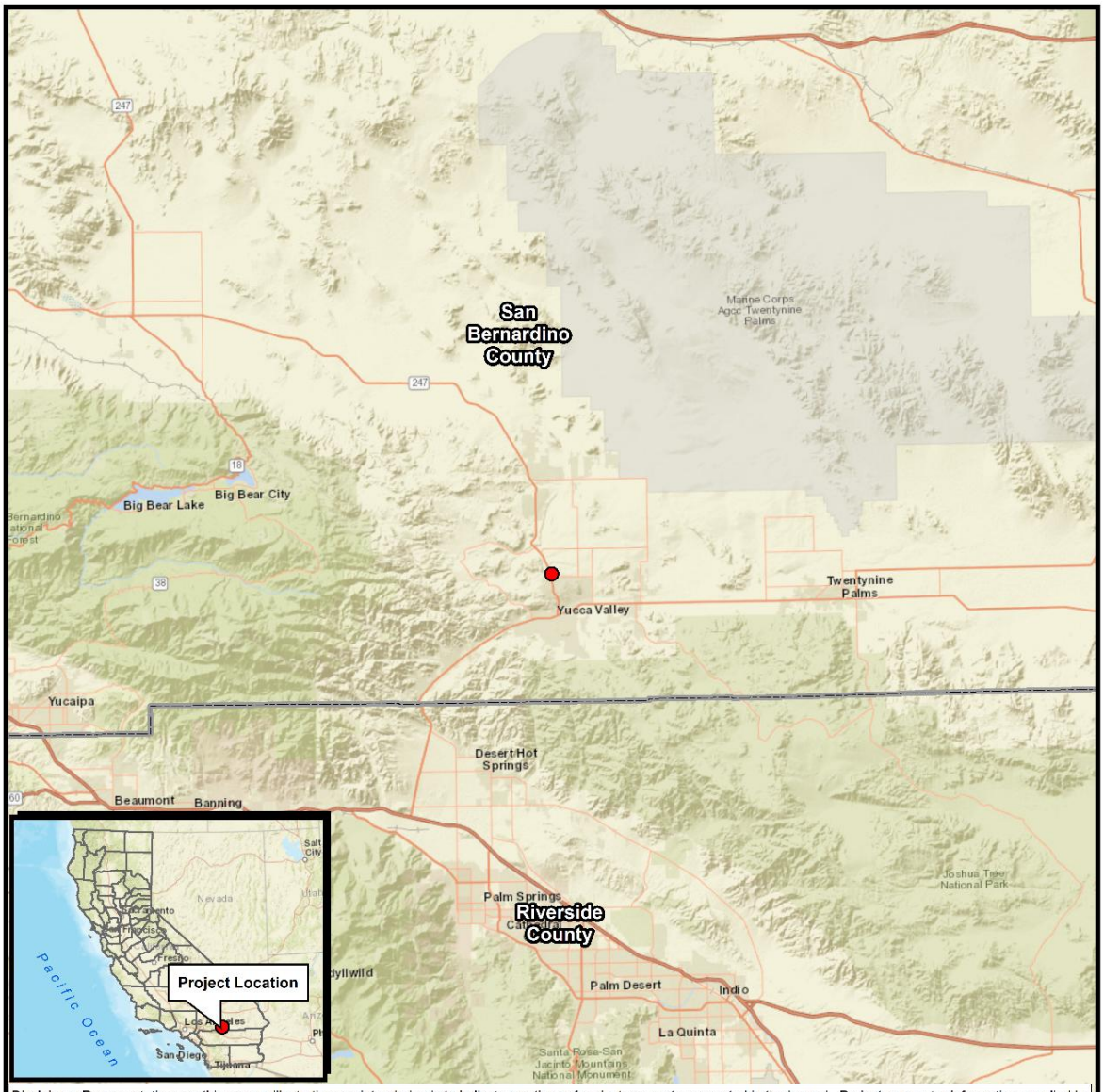
Figure 2.2-1 illustrates the topography of the project site and the surrounding area. As shown, site elevations vary only slightly, and the property is generally characterized by a flat to gently sloping surface that drains toward the southwest. According to 2025 Google Earth elevation data, the terrain exhibits minimal relief, reflecting the broader geomorphology of the Morongo Basin, where broad alluvial plains transition into upland desert foothills.

Site photographs included in **Figure 2.2-2** provide visual confirmation of existing onsite conditions, including the undeveloped character of the parcel, the absence of structural development, the surrounding roadway network, and the adjacent vacant land and commercial uses. These photographs also illustrate the site's desert setting, surface soils, and existing access from Newton Lane and Sun Mesa Drive, which define the northern and western boundaries of the parcel.

2.2.1 Land Use and Zoning

The land use pattern surrounding the project site consists of a mix of vacant parcels, low-intensity commercial uses, and industrial operations that reflect the transitional character of this portion of the Town of Yucca Valley. The project site itself is designated Industrial (I) under both the Town of Yucca Valley General Plan and Zoning Map (Town of Yucca Valley, 2014). This designation is intended to accommodate a broad range of light industrial, storage, and service-oriented uses that require larger parcels and separation from residential neighborhoods.

Figure 2.2-1
REGIONAL LOCATION



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_2_0_Regional_Location_2025_07_17.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; UltraSystems Environmental, Inc., 2025.

July 17, 2025

Scale: 1:633,600

N

0 5 10 Miles

0 5 10 Kilometers

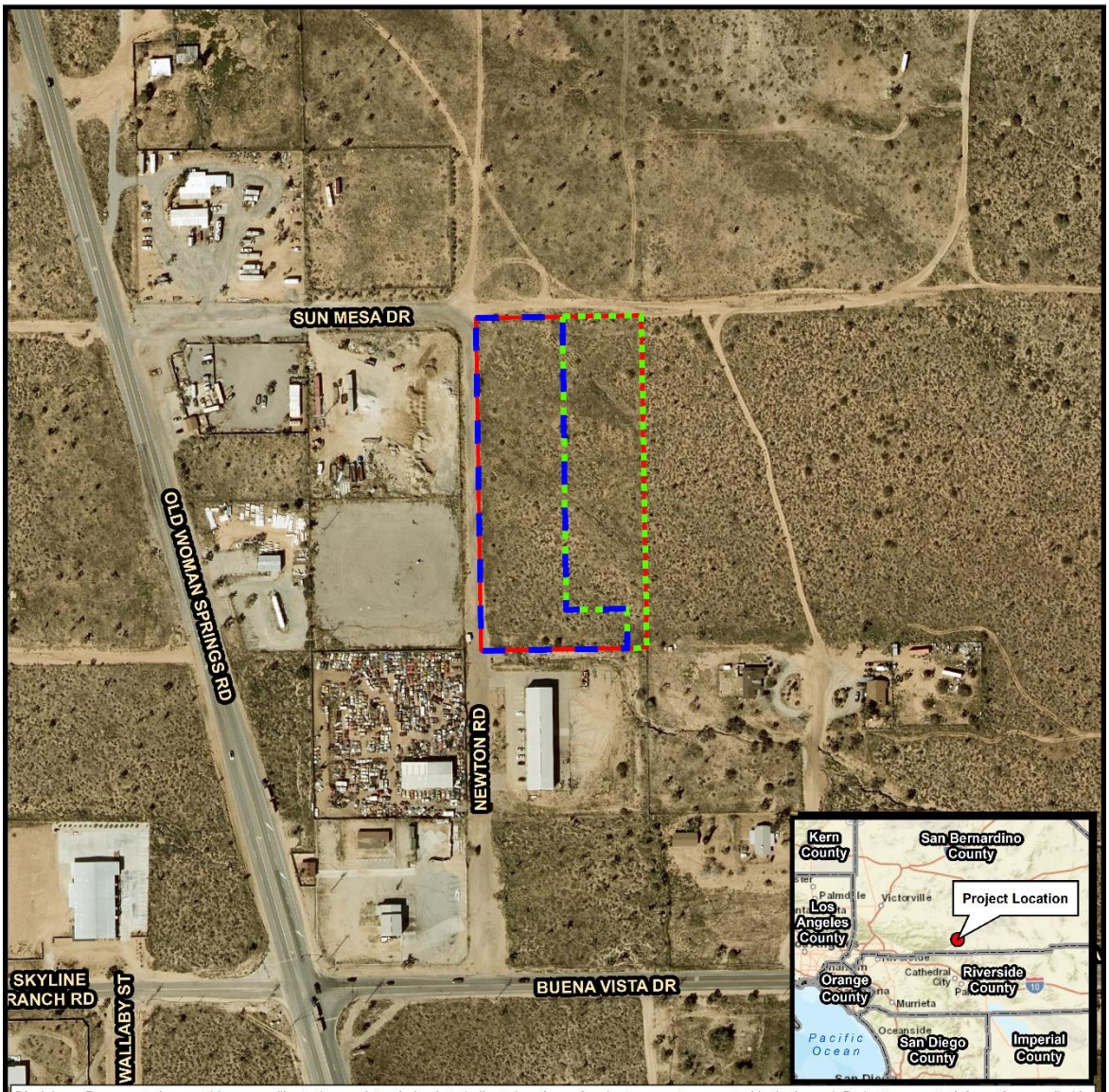
Legend

- Project Location
- County Boundary

Sun Mesa Self-Storage Facility
Regional Location

UltraSystems environmental • management • planning

Figure 2.2-2
PROJECT LOCATION



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_2_0_Project_Location_2025_07_23.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community UltraSystems Environmental, Inc., 2025.

July 28, 2025

Scale: 1:3,300

N

0 137.5 275 Feet

0 25 50 Meters

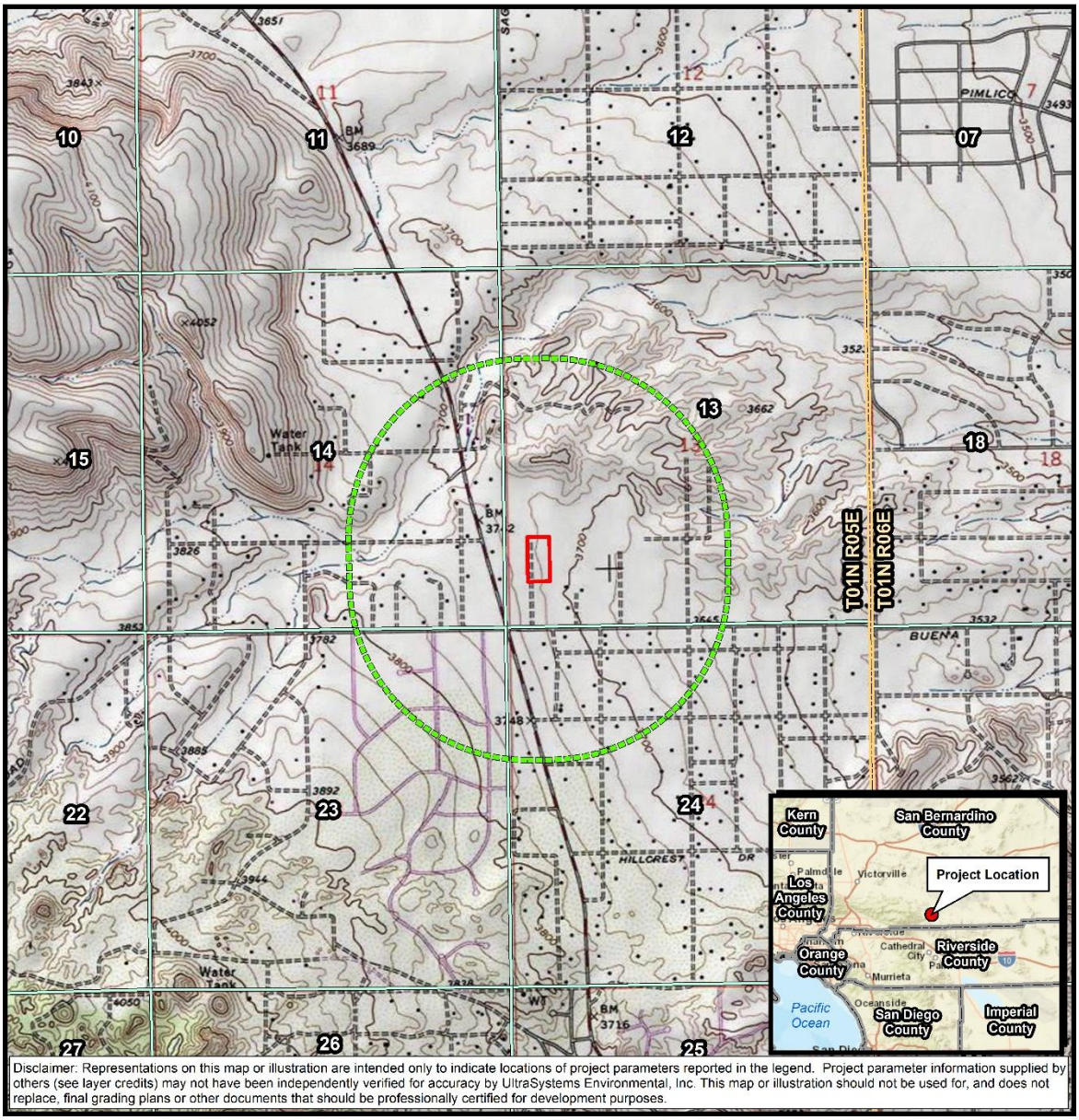
Legend

- Phase 1 Boundary
- Phase 2 Boundary
- Project Boundary

Sun Mesa Self-Storage Facility
Project Location

UltraSystems environmental•management•planning

Figure 2.2-3
TOPOGRAPHIC MAP



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_5_Topo_2025_07_28.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Copyright:© 2013 National Geographic Society, i-cubed California Department of Conservation, 2019; CALAtlas, 2022; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Scale: 1:24,000

N

0 625 1,250 Feet

0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Sun Mesa
Self-Storage Facility
Topographic Map
Quadrangle: Yucca Valley North
Township: 1N Range: 5E
Section:13

UltraSystems
environmental•management•planning

Figure 2.2-4
PROJECT SITE PHOTOGRAPHS

Photo 1: View looking south at Joshua tree woodland from the northwest corner of the project site.

Photo 2: View looking south at Joshua tree woodland from the northeast corner of the project site.

Photo 3: View looking west at Joshua tree woodland from the southeast corner of the project site.

Photo 4: View looking north at Joshua tree woodland from the southwest corner of the project site.

Existing land uses immediately surrounding the project site are summarized in **Table 2.2-1**. As shown, the northern and eastern areas consist primarily of vacant land with Rural Living (RL) designations, allowing for large-lot rural residential development consistent with the area's low-density pattern. The parcel to the west is zoned Industrial (I) and is developed with natural gas truck storage, a use compatible with the proposed project. South of the project site lies a Neighborhood Commercial (C-N) zone that supports small-scale commercial services, developed with an existing manufacturing company (Full Circle) adjacent to the project site.

This land use context reflects a logical transition from more intensive commercial and industrial activities along Old Woman Springs Road (SR-247) to lower-density rural residential lands to the north and east. The proposed self-storage facility is consistent with the industrial character along Newton Lane and would not introduce land use conflicts with surrounding zoning districts.

Table 2.2-1
SUMMARY OF EXISTING LAND USE, ZONING AND EXISTING DEVELOPMENT

Location	General Plan Designation	Zoning Designation	Existing Development
Project Site	Industrial (I)	Industrial (I)	Vacant land
North	Rural Living (RL-5)	Rural Living (R-L-5)	Vacant land
South	Commercial (C)	Neighborhood Commercial (C-N)	Manufacturing
East	Rural Living (RL)	Homestead Valley/Rural Living (HV/RL)	Vacant land
West	Industrial (I)	Industrial (I)	Natural gas truck storage

Source: Town of Yucca Valley, 2025c; County of San Bernardino, 2025b

2.3 Existing Characteristics of the Site

The project site consists of an approximately 4.34-acre undeveloped parcel located at the southeast corner of Sun Mesa Drive and Newton Lane in the Town of Yucca Valley. The site contains no existing structures, paved surfaces, utilities, or signs of prior development. Surface conditions are typical of the high desert environment, with exposed sandy soils, limited vegetation, and evidence of informal vehicle access. Surrounding land uses include commercial and industrial development to the south and west, and vacant rural residential land to the north and east. Existing access is provided by the unimproved roadway edges along Sun Mesa Drive and Newton Lane, with stormwater draining naturally across the parcel in a southwest direction.

2.3.1 Climate and Air Quality

The project site is located within the Mojave Desert Air Basin (MDAB), which is characterized by an arid desert climate with hot, dry summers, cool winters, and low annual precipitation. Average summer temperatures frequently exceed 100 degrees Fahrenheit, while winter temperatures commonly range from the mid 30s to mid 60s. Annual precipitation averages approximately four to six inches, most of which occurs during winter frontal storms and occasional late summer monsoonal events (WRCC, 2025).

The region experiences persistent high-pressure systems that limit cloud cover and promote high solar radiation levels. Winds are typically moderate but can become strong during seasonal Santa Ana wind events or monsoonal thunderstorms. These wind patterns influence the dispersion of air pollutants and contribute to the potential for elevated particulate matter levels due to windblown dust.

Air quality in the Yucca Valley area is regulated by the Mojave Desert Air Quality Management District (MDAQMD), which is responsible for setting and enforcing air quality rules, reviewing project emissions, and maintaining attainment planning documents. The MDAB is currently designated nonattainment for ozone (O_3) and particulate matter (PM10) under state and federal standards, and attainment for most other criteria of pollutants (ARB, 2025). Local air quality conditions are influenced by both regional transport from the South Coast Air Basin and locally generated emissions from vehicle travel, commercial activities, and fugitive dust from disturbed soils.

Because the project site is undeveloped, existing onsite emissions are limited to naturally occurring fugitive dust, sparse biological activity, and intermittent vehicle trips associated with surrounding uses. No stationary sources of emissions exist on the property.

2.3.2 Geology and Soils

The project site is located within the Morongo Basin, an area underlain primarily by Quaternary age alluvial deposits consisting of unconsolidated sands, silts, gravels, and cobbles derived from adjacent upland drainages. These valley floor deposits exhibit loose to moderately compacted soil conditions typical of young alluvial fan environments found throughout the high desert region. No bedrock is exposed at the surface, and consolidated formations are expected only at depth beneath the alluvium. The site's topography is relatively flat, with surface elevations between approximately 3,280 and 3,290 feet above mean sea level, gently sloping from northeast to southwest consistent with natural sheet flow drainage patterns. The surrounding landscape exhibits minimal relief, and no steep slopes, landslide hazards, or erosional scarps occur within or adjacent to the property (Sladden, 2025a).

The project site is located within an Alquist-Priolo Earthquake Fault Zone and in a mapped trace of the Johnson Valley Fault Zone traverses the project site as further analyzed in **Section 4.7**. The project geotechnical investigation recommends subsurface fault-rupture studies to evaluate active surface-rupture potential and notes that habitable structures are not permitted across active fault zones. The geotechnical report further states that, based on the proposed project description, the self-storage units and offices are not intended for human occupancy or to exceed 2,000 person hours per year. The applicant anticipates that one part-time employee would be present onsite. Self-storage customer visits would be intermittent and typically short in duration; therefore, estimating total annual customer occupancy time would be speculative. Given the limited on-site occupancy and the absence of habitable structures, the potential for exposure to surface-rupture hazards is reduced; impact significance is addressed in Section **4.7** of this Initial Study.

2.3.3 Hydrology

The project site is located within the Mojave Desert region, which is characterized by arid climatic conditions, low annual precipitation, and episodic stormwater runoff. The site drains generally from the northeast toward the southwest in shallow sheet flow, consistent with the flat alluvial topography of the area. No natural drainage, blue line streams, jurisdictional waters, or defined channels exist onsite. The site is not located within a 100 year or 500-year Federal Emergency Management Agency (FEMA) flood hazard zone and is mapped within Flood Zone X, indicating areas of minimal flood risk. Surface soils consist primarily of sandy alluvium with moderate infiltration capacity, and stormwater currently infiltrates directly into onsite soils or disperses as sheet flows across the undeveloped parcel during storm events.

Groundwater in the region typically occurs at depths greater than 200 feet below ground surface, reflecting the deep basin characteristics of the Morongo groundwater system. As a result, shallow

groundwater does not influence surface hydrologic conditions at the project site, and there is no evidence of perched water, springs, or saturated soil conditions onsite. The Hi Desert Water District manages regional groundwater resources for municipal supply, but no groundwater extraction occurs on the project parcel. The site is not located near a dam inundation zone, alluvial fan flood hazard area, or natural watercourse that would pose elevated hydrologic risk.

Stormwater conveyance in the surrounding area consists primarily of natural sheet flow supported by roadside swales and limited curb and gutter improvements along developed frontage. Because the project site is undeveloped, no existing stormwater infrastructure is present. Future project development will be required to comply with the Town of Yucca Valley Municipal Code Municipal § 9.37.060: Erosion Control, Runoff Control, and Enforcement and the San Bernardino County requirements for onsite stormwater management, including implementation of best management practices to ensure post construction runoff volumes and water quality conditions meet local and regional standards.

2.3.4 Biology

As detailed in **Section 4.4** of this Initial Study, the project site and Biological Study Area (BSA) occur in the Mojave Basin and Range region and are characterized by generally flat topography (approximately 3,710 to 3,726 feet amsl) within a developed setting bordered by industrial, commercial, and largely vacant residential lands. Vegetation within the site is best characterized as disturbed Joshua tree woodland, with dominant species including western Joshua tree and Mojave yucca with common desert scrub and nonnative annual grasses/forbs. LSA documented western Joshua tree onsite, including a census of 98 individuals within the project site and immediate census buffer, and did not observe additional special-status plant species during focused rare plant surveys. Wildlife observed during field surveys included common desert birds and reptiles/mammals, and a special-status bird species (loggerhead shrike) was recorded. No wetlands or other jurisdictional waters were identified on the site, and no USFWS-designated critical habitat was mapped within the BSA. Regional mapping indicates the BSA does not overlap designated habitat connectivity linkages; however, surrounding open lands can provide local movement opportunities for desert wildlife. Applicable biological regulatory considerations in the area include protections for nesting birds (MBTA and California Fish and Game Code), and local/state controls on take or removal of desert native plants and Joshua trees (e.g., California Desert Native Plants Act, Western Joshua Tree Conservation Act, and the Town's native plant/tree permitting requirements).

2.3.5 Public Services

The project site is located within the Town of Yucca Valley and is served by a range of local and regional public service providers. Fire protection and emergency response services are provided by the San Bernardino County Fire Protection District, which operates several stations within the Morongo Basin. Response capabilities in the project area are supported by an established roadway network, including Old Woman Springs Road (SR 247) and State Route 62, which allow personnel and equipment to reach the site within standard response times. The project site is currently undeveloped and does not contain structures or activities that generate demand for fire suppression, emergency medical response, or hazardous materials services.

Law enforcement services are provided by the San Bernardino County Sheriff's Department through the Morongo Basin Station. The surrounding area consists of a mix of commercial, industrial, and

rural residential uses that generate relatively low levels of service demand. The undeveloped condition of the project site results in minimal existing law enforcement needs.

Parks, recreational services, and community facilities are administered by the Town of Yucca Valley Department of Community Services. Several public parks, open space areas, and recreational amenities are located throughout the community; however, no park or recreational facility occurs adjacent to or within the project site. As a vacant parcel, the site does not generate recreational demand or contribute to the use of existing parkland or community facilities.

Public education services in the region are provided by the Morongo Unified School District. Because the project site does not contain residential development, it does not contribute to school enrollment or require educational services. Similarly, library services, public health services, and other general municipal functions experience no measurable demand associated with the existing condition of the property.

The current undeveloped status of the site results in negligible or no demand for public services, and service providers in the area maintain the capacity and infrastructure needed to support existing land uses surrounding the project area.

2.3.6 Utilities

The project site is currently undeveloped and does not contain existing utility connections or built infrastructure. Water service in the area is provided by the Hi-Desert Water District, which maintains groundwater supply wells, storage facilities, and distribution lines throughout the Town of Yucca Valley. Potable water lines are present within adjacent public roadways, although no active service connections extend into the project parcel. Wastewater treatment services are not available in this portion of Yucca Valley, and properties in the vicinity rely on individual septic systems for wastewater disposal. The project site does not contain an existing septic system, leach field, sewer connection, or wastewater conveyance facilities.

Electricity is supplied by Southern California Edison through an established regional distribution network with overhead and underground service lines located in surrounding rights of way. Telecommunications services, including telephone and broadband, are available through local providers operating within the Town; however, the project site lacks direct service extensions or equipment. Solid waste collection and disposal in Yucca Valley is provided by Burrtec Waste and Recycling, and the nearest permitted disposal facility is the Landers Sanitary Landfill.

Stormwater at the site drains as natural sheet flow to the southwest, and no storm drain pipes, inlets, culverts, or engineered drainage improvements exist on the parcel. The absence of development results in minimal utility demand, and the site currently relies on natural hydrologic processes for drainage. Roadway access is limited to the adjacent unimproved edges of Sun Mesa Drive and Newton Lane, with no internal pavement, curbs, or driveways present.

The existing utility and infrastructure conditions reflect the vacant nature of the parcel and do not present constraints that would impede extension of standard municipal services in conjunction with future development consistent with Town requirements.

3.0 PROJECT DESCRIPTION

3.1 Project Background

The Town of Yucca Valley (Town) is processing a request to implement discretionary actions that would allow for the development of a self-storage facility (project) southeast of the intersection of Newton Lane and Sun Mesa Drive in the Town of Yucca Valley in San Bernardino County (APN: 0597-111-67). The proposed project includes the development of approximately 541 storage units, a manager's office, parking, internal roads, and landscaping on an approximately 4.34-acre site. In addition, offsite improvements (including partial pavement of adjacent roads) would be provided. The Town is the Lead Agency for the purposes of the CEQA.

The Town's General Plan Land Use and zoning designation for the site is Industrial. The proposed project requires a Site Plan Review.

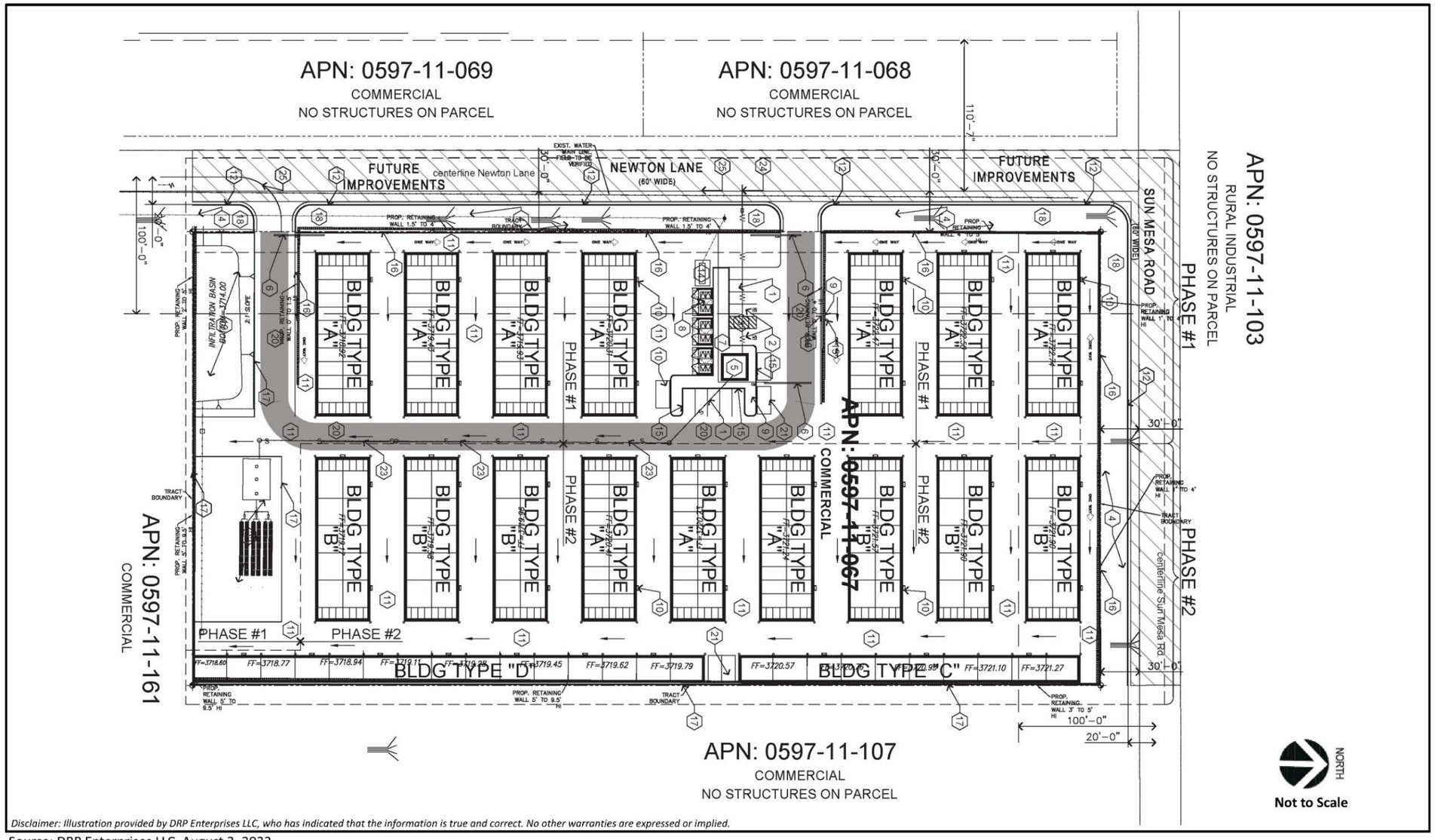
3.2 Project Overview

The project would consist of: (1) utilities improvements; (2) construction of self-storage units and a manager's office; (4) parking; (5) landscaping; and (6) improvement of half of Newton Lane along the project's west boundary and Sun Mesa Drive along the north boundary. **Figure 3.2-1** is a site plan depicting the layout of the proposed project buildings and onsite amenities. **Table 3.2-1** summarizes the proposed project features. Project site plans are included as **Appendix A**.

Table 3.2-1
PROJECT SUMMARY

New Construction	Proposed Uses/Features	Area (sf)	No. of Stories	Building Height
Self-Storage Units and Manager's Office	541 self-storage units in 16 buildings (89,300 sf), plus one manager's office (400 sf)	89,700	1	9 ft. 6 in. (storage) 12 ft. (office)
Parking Spaces	10 parking spaces and five loading zones	83,972	N/A	N/A
Landscaping	Variety of trees, shrubs/native plants, and decorative rocks	15,378	N/A	N/A
Improvements of Newton Lane and Sun Mesa Drive	20 feet width of pavement plus 6 feet of curb, gutter and sidewalk on each street (Town of Yucca Valley, 2014).	N/A	N/A	N/A

Figure 3.2-1
SITE PLAN



Disclaimer: Illustration provided by DRP Enterprises LLC, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Overall Site Plan

3.3 Proposed Project Features

3.3.1 Self-Storage Units and Manager's Office

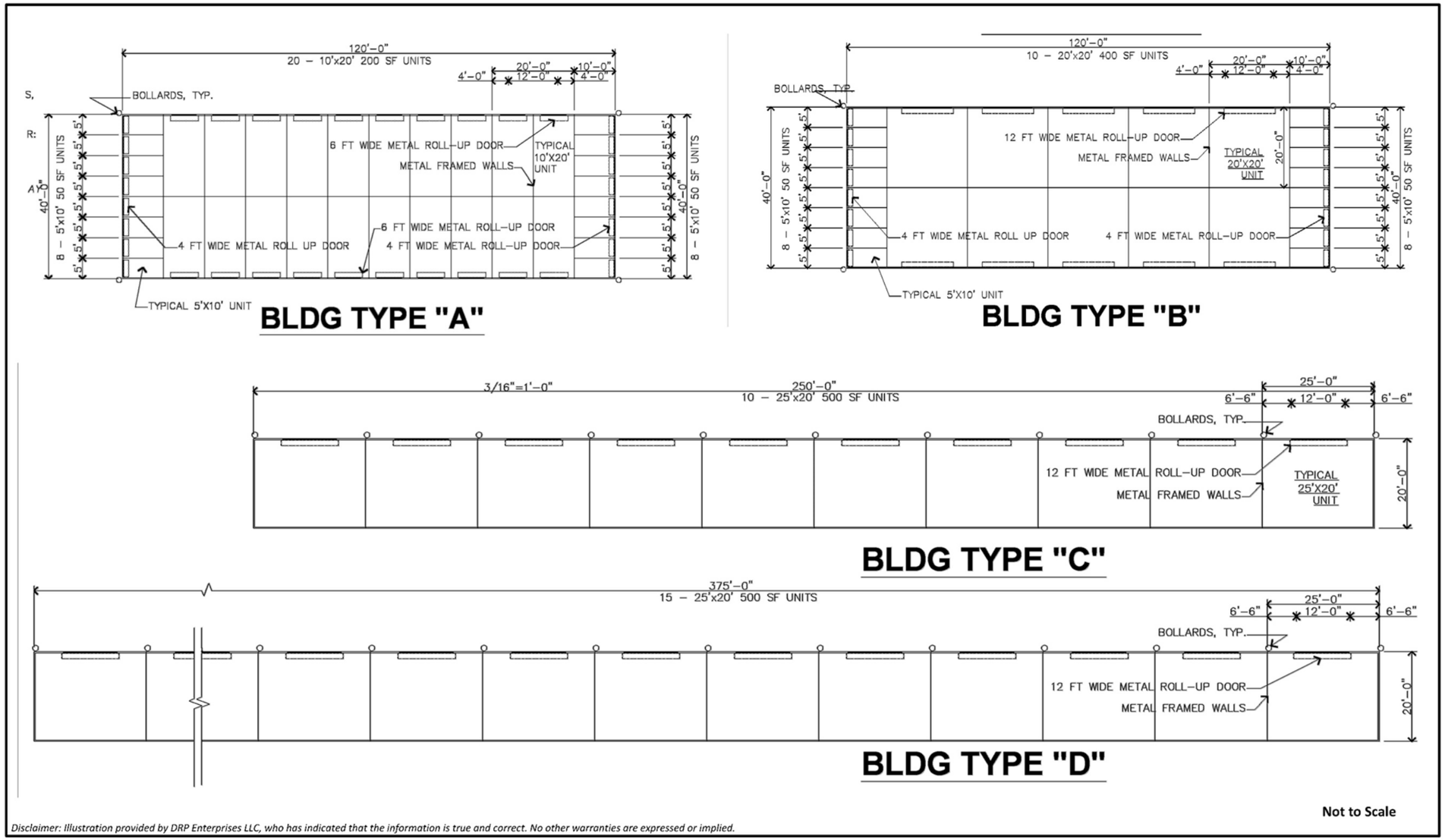
Implementation of the proposed project would develop approximately 541 self-storage units within four types of buildings referred to as Type A, Type B, Type C, and Type D. One manager's office would be referred to as Type E. Each type of building would consist of varying storage unit sizes. A breakdown of the units is shown below in **Table 3.3-1**. **Figures 3.3-1 to 3.3-3** depict the project's floor plan, elevations, and perspective. The proposed project includes an architectural style that would complement the surrounding desert development with brown, tan, and white colors. The color board of the project is depicted in **Figure 3.3-4**.

Table 3.3-1
BUILDING TYPE BREAKDOWN

Types	Unit Count				Area per Building (sf)	Number of Buildings	Area per Building Type (sf)
	5 x 10 (50 sf)	10 x 20 (200 sf)	20 x 20 (400 sf)	25 x 20 (500 sf)			
Type A	16	20			4,800	10	48,000
Type B	16		10		4,800	6	28,800
Type C				10	5,000	1	5,000
Type D				15	7,500	1	7,500
Type E[1]			1		400	1	400
Total Units	**256**	**200**	**60[2]**	**25**		**19**	**89,700**

1. Managers Office
2. Managers Office not included

Figure 3.3-1
FLOOR PLAN



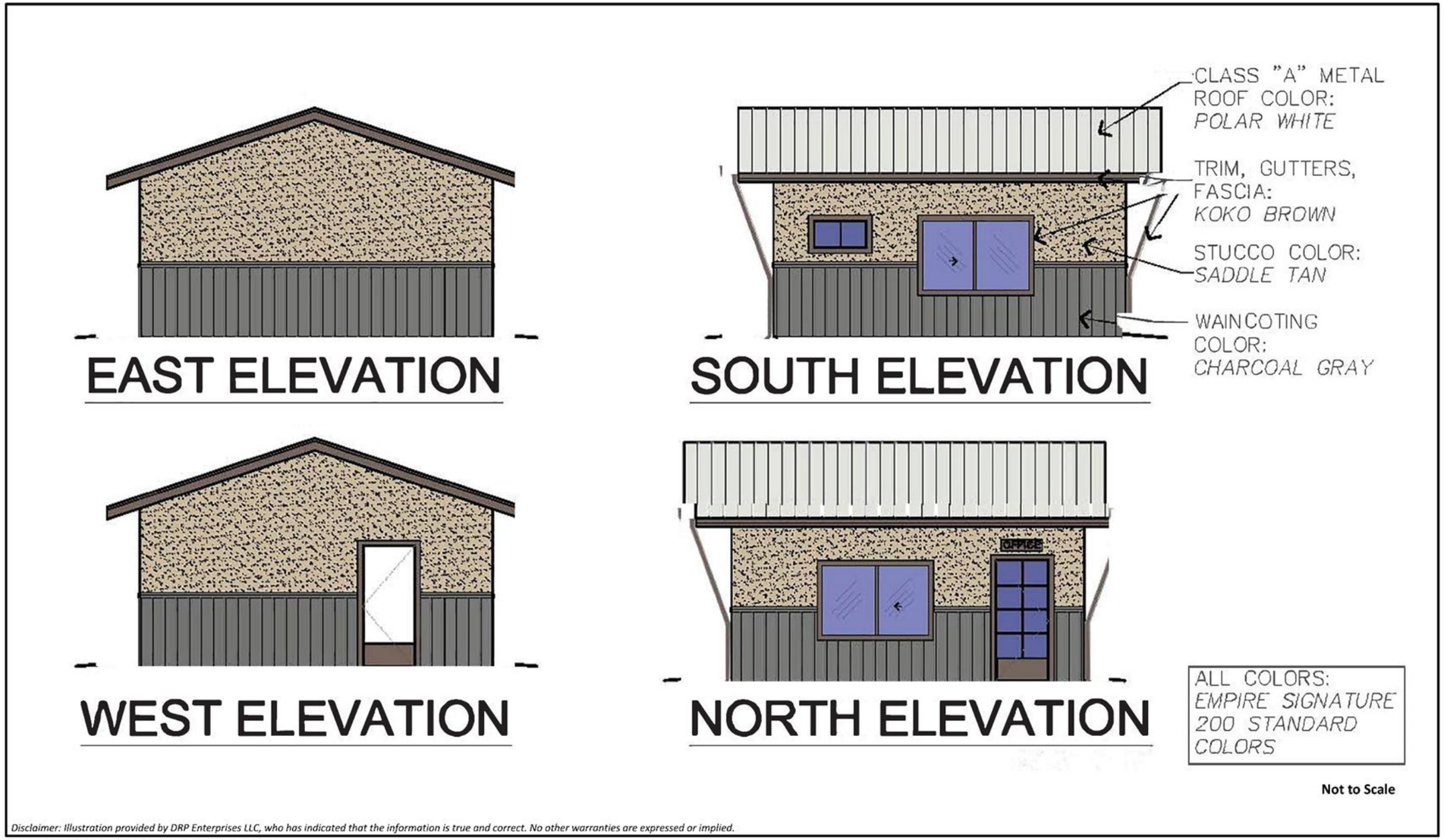
Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Floor Plans

UltraSystems
environmental•management•planning

Figure 3.3-2
ELEVATIONS



Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Elevation Plans

UltraSystems
environmental•management•planning

Figure 3.3-3
PERSPECTIVE

NOTE: THESE PERSPECTIVE ELEVATIONS ARE REPRESENTATIVE ONLY, TO ILLUSTRATE THE TYPE OF METAL BUILDING PROPOSED.

Disclaimer: Illustration provided by DRP Enterprises LLC, who has indicated that the information is true and correct. No other warranties are expressed or implied.

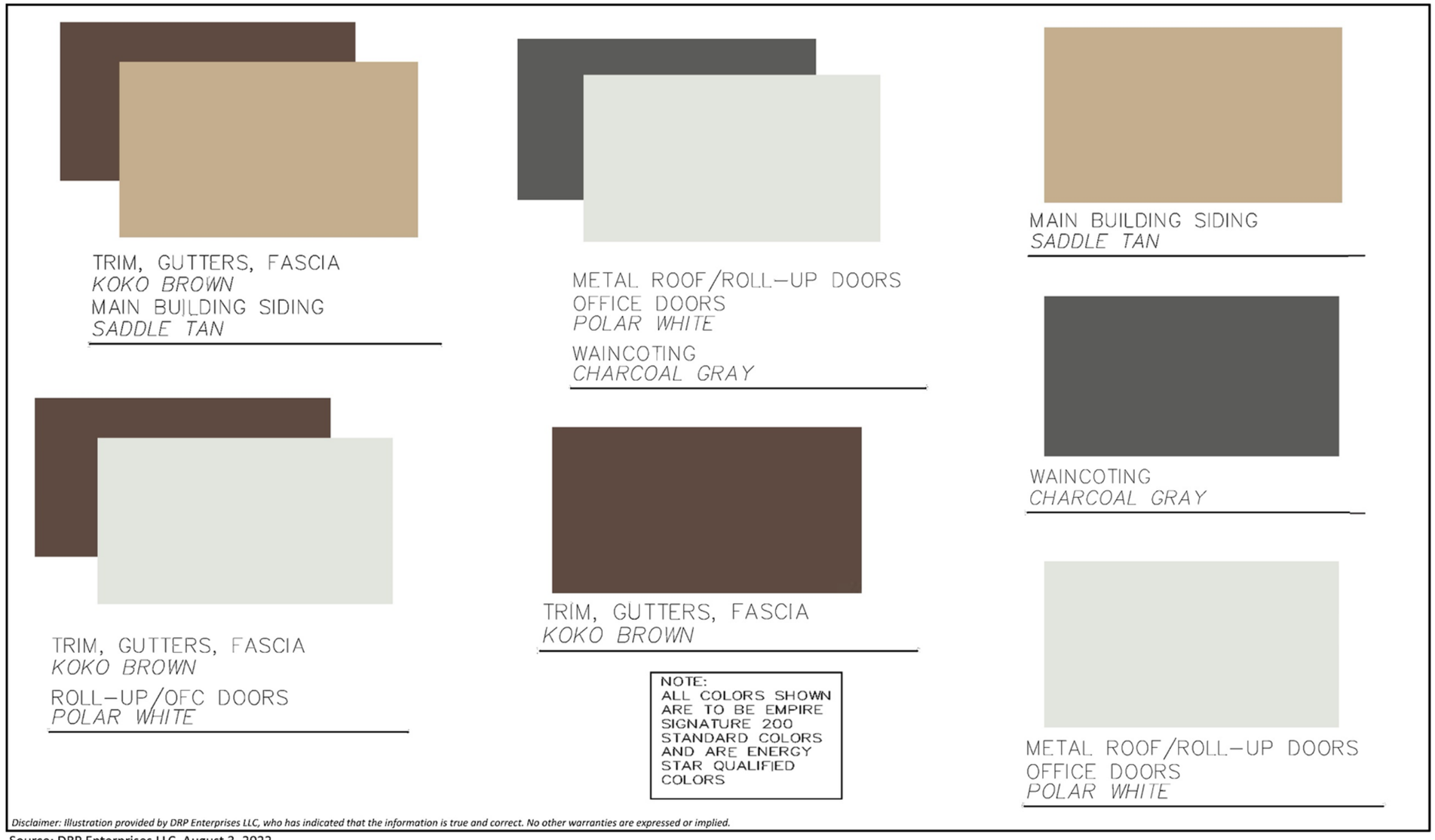
Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Sample Perspective Elevations

UltraSystems
environmental•management•planning

Figure 3.3-4
COLOR BOARDS



Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Color Board

UltraSystems
environmental•management•planning

Landscaping

The proposed project includes several landscaped areas along the perimeter and the manager's office as shown in **Figure 3.3-5;** the total landscaped area is approximately 15,378 square feet (eight percent of total site area). Landscaping would consist of several deciduous trees, drought tolerant shrubs/native plants and decorative rocks.

3.3.2 Site Access, Circulation and Parking

Site ingress and egress would be provided by two 30-foot-wide driveways located on Newton Lane. Access to storage units would be provided through several internal lanes that vary from 15 to 30 feet in width. Parking would be at the manager's office area at the western portion of the site. Access to parking would be via a main driveway running north/south through the middle of the site. Sidewalks and pedestrian travel paths are proposed throughout.

The proposed project includes 10 parking spaces, consisting of eight standard parking spots, one standard American Disability Act (ADA) parking spot and one van ADA spot. Additionally, there would be five loading spots.

3.3.3 Exterior Lighting

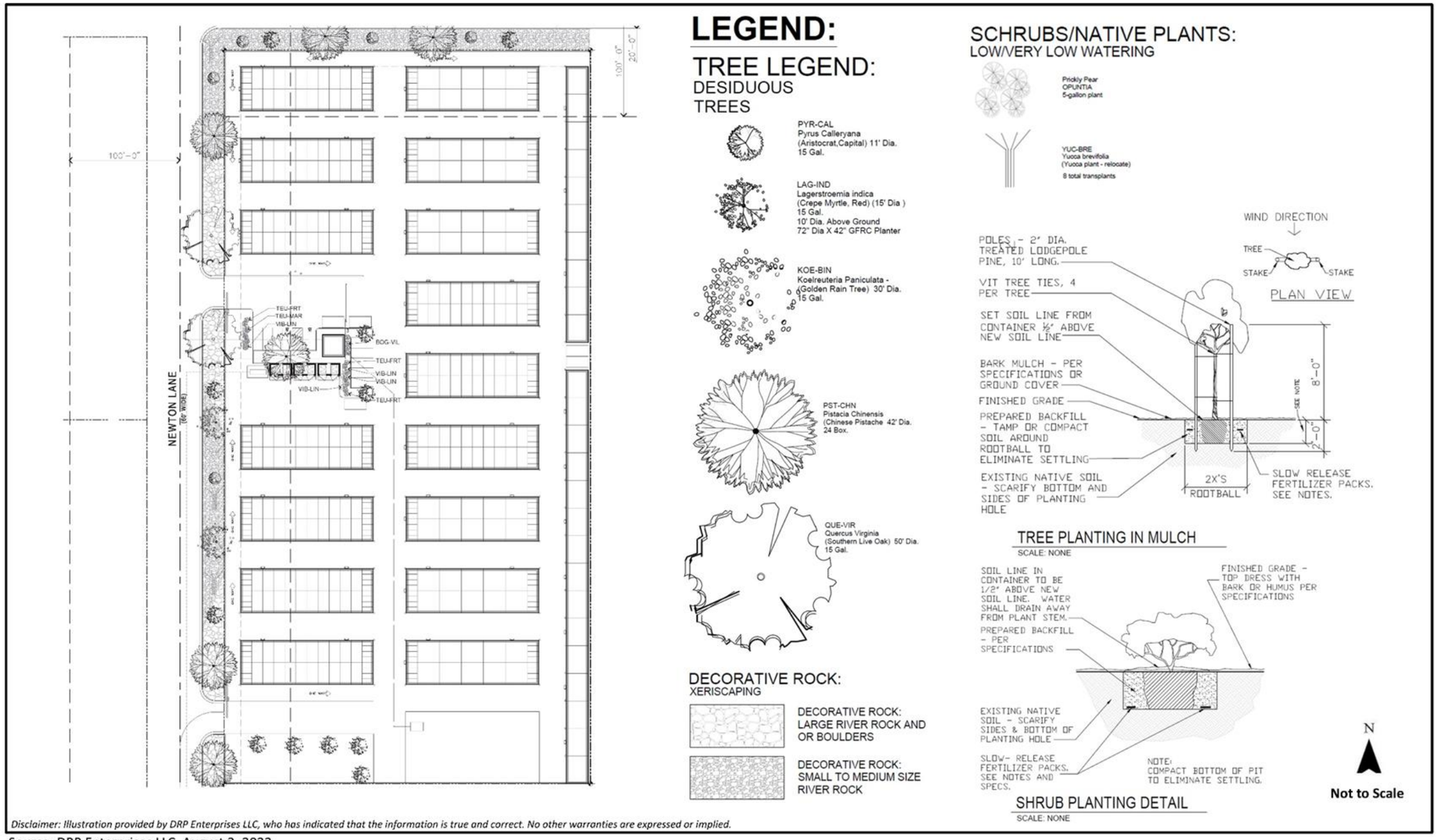
The proposed project includes area lighting throughout the project site. Lighting for the project would comply with the requirements of the Town's Municipal Code Chapter 8.70. Specifically, the project would be required to comply with Town of Yucca Valley Municipal Code § 8.70.020, "*Any outdoor lighting fixtures shielded or constructed so that light rays are only emitted by the installed fixtures at angles below a horizontal plane passing through the lowest point of the light source and so not to direct light or light trespass onto adjacent property*.."

The proposed project would include installation of exterior lighting fixtures, as necessary, for safety and security. LED exterior fixtures would be mounted on the walls of the buildings. The latest LED lighting fixtures with photosensors and motion sensors would be provided. Cut off shield would be provided as necessary to prevent light spillage beyond the project boundary. Parking lot lighting would also utilize LED technology. Photometric analysis would be conducted to ensure that the exterior lighting provided on site meets the minimum lighting levels required.

3.3.4 Perimeter Fencing and Exterior Walls

A six-foot-tall concreate masonry wall would surround the project site, except at the two driveways on Newton Lane that would have rolling security gates.

Figure 3.3-5



Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Landscape Plan

UltraSystems
environmental•management•planning

LANDSCAPE PLAN

3.3.5 Utilities

Water supply to the project site is provided by High Desert Water District, and wastewater services are provided by a private septic disposal company. In addition, electricity supply is provided by Southern California Edison, telephone services are provided by Verizon, cable service is provided by Time Warner Cable, and solid waste disposal services are provided by Burrtec. The project would require domestic water, fire water, irrigation and dry utilities connections to existing utility infrastructure in Newton Lane. A septic system, including a leach field at the south end of the project, will handle wastewater.

3.3.6 Offsite Improvements

Construction would need to occur in Newton Lane and Sun Mesa Drive, which would be paved to half-width (26 feet) along the western and northern project boundaries (along with sidewalk and gutters), respectively, and to connect the electric lines and water supply for the proposed project to the existing underground lines in Newton Lane.

3.4 Construction Activities

For safety reasons, temporary barricades would be used to limit access to the site during project construction and maintain safe access for construction workers. Construction would occur during daylight and during regular business hours. Lighting for the construction site would be limited to the minimum amount of light needed for safety and security.

Site grading would involve a cut of 4,970 cubic yards (cy) and fill of 4,485 cy of soil. After site preparation is completed, infrastructure such as sewer laterals and storm drains would be installed and/or connected to existing facilities. The building foundations would be poured and assembly of prefabricated metal panels of the buildings would begin. The final steps of construction would involve interior furnishings, detailed work, and completion of common areas and outside landscaping.

The only offsite improvements would be street-related improvements and installation of utility laterals and connections of laterals to the mains. The construction contractor would use heavy equipment during grading. Construction staging would be limited to the project site; no offsite areas would be used.

Construction Schedule

Construction activities will be conducted in two phases,-. Phase 1 will include construction of seven storage buildings (252 storage units totaling 33,600 sf) plus the 400-sf manager's unit, and Phase 2 will include construction of 11 buildings (290 storage units totaling 29,688 sf).

Construction would start in January 2026. Construction of Phase 1 will take three to four months. Start of Phase 2, which includes the offsite improvements, will be dependent on the lease-up of units in Phase 1. Construction of Phase 2 will take an additional three to four months to complete.

3.5 Discretionary Actions

The proposed project includes an application for a Site Plan Review. No other discretionary actions are required.

3.6 Other Permits and Approvals

Following the Town's approval of the Initial Study/Mitigated Negative Declaration, the following permits/approvals, as shown in **Table 3.6-1,** would be required prior to construction.

Table 3.6-1
PERMITS AND APPROVALS

Agency	Permit or Approval
Town of Yucca Valley Building & Safety Division	Building Permits
Town of Yucca Valley Public Works/Engineering Department	Grading Permit, Street Improvement Plan, and Encroachment Permit
Town of Yucca Valley Planning Division	Site Plan Review and Environmental Assessment
San Bernardino County Fire Protection District	Building plan check and approval. Review for compliance with the current California Fire Code, current California Building Code, California Health & Safety Code and Town of Fontana Municipal Code. Plans for fire detection and alarm systems, and automatic sprinklers.

4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

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

☐ Aesthetics	☐ Agricultural and Forest 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:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature	Date
Printed Name	Town of Yucca Valley

Evaluation of Environmental Impacts

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

(2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

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

(4) "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to less than significant level.

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

(a) Earlier Analyses Used. Identify and state where the earlier analysis available for review.

(b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

(c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached and other sources used or individuals contacted should be cited in the discussion.

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

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

(9) The explanation of each issue should identify:

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

4.1 Aesthetics

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

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

<u>Less than Significant Impact</u>

The Town's General Plan does not specify specific scenic vistas. However, Yucca Valley's scenic resources are a valued local asset. The natural setting of the Town is characterized by the ridges and hillsides north, west, and south of the Town and the desert valley lands to the east. The desert environment, natural resources, and active open space opportunities are a core aspect of Yucca Valley's character and are a significant attraction for visitors seeking recreation. Views from the Town situate the community in its local environment and landscape and are an important element of the Town's quality of life. Many of the scenic resources that are valued by Yucca Valley residents and visitors are outside the Town limits and beyond the planning area boundary. Such areas include the views of the Little San Bernardino Mountains of the Peninsular Ranges, the San Bernardino Mountains on the easternmost of the Transverse ranges surrounding the Town, and Yucca Valley's hillside areas (Town of Yucca Valley, 2014, p. 5-34).

There are distant views of surrounding mountains and ridgelines from the project site. The project would develop a storage facility with associated office, parking and landscaping. The height of the proposed buildings would range from nine to 12 feet tall, similar to the height of the surrounding commercial, industrial and residential buildings. Therefore, development would not significantly affect the distant views of the mountains as the proposed project would be of similar height, mass

and scale consistent with the existing land uses in the surrounding area, resulting in less than significant impacts.

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

No Impact

The California Department of Transportation (Caltrans) provides information regarding officially designated or eligible state scenic highways, designated as part of the California Scenic Highway Program. As shown in **Figure 4.1-1**, the nearest officially designated state scenic highway to the project site is the State Route 62 (SR 62) freeway approximately 13.2 miles southwest. Due to the large distance between the project site and SR 62, construction and implementation of the project would have no impacts on state scenic highways. Therefore, the project would have no impacts on trees, rock outcroppings and historic buildings within a state scenic highway.

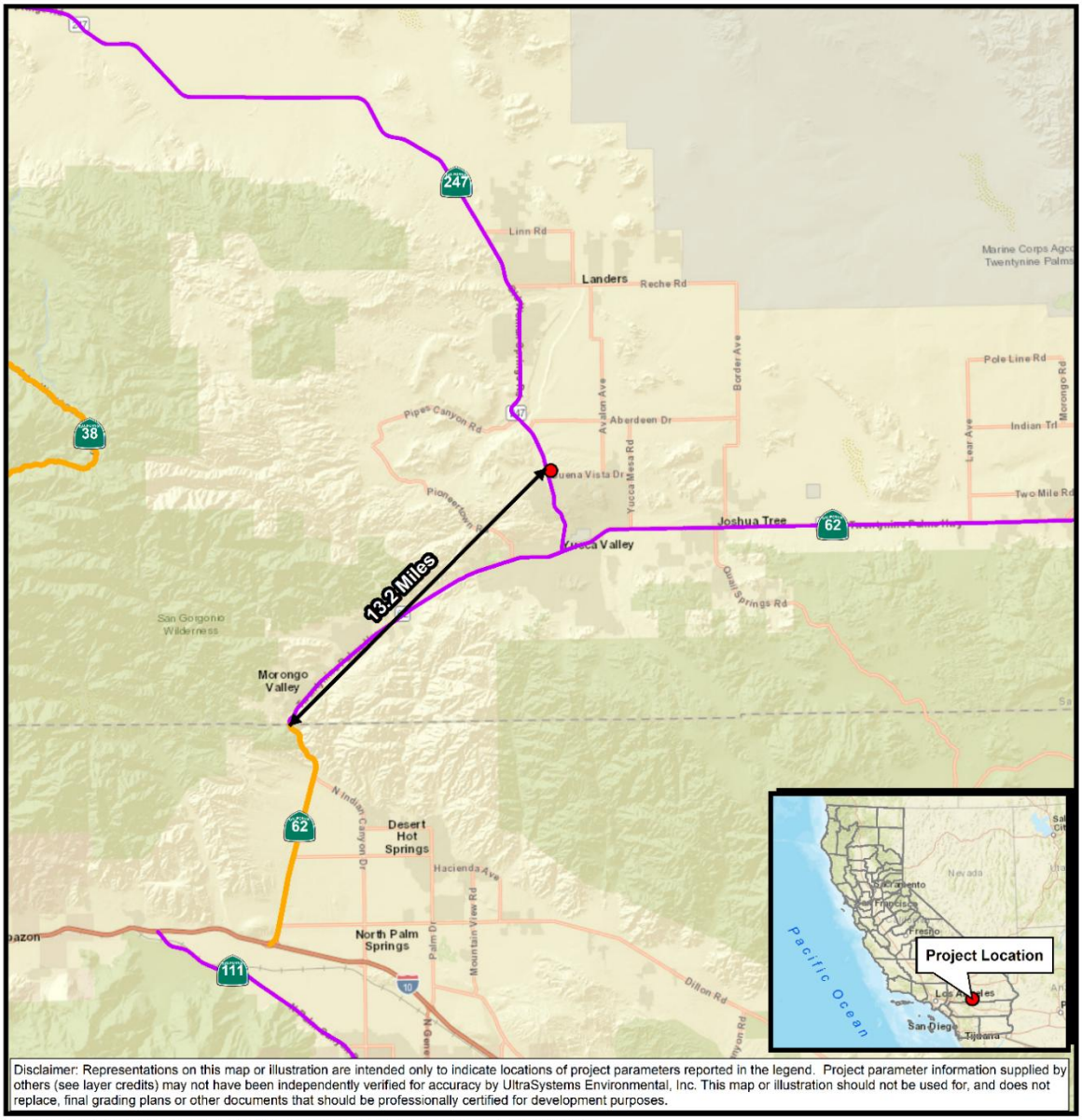
c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact

The Town of Yucca Valley is an incorporated municipality with a population of 21,740 as of the 2020 U.S. Census (U.S. Census Bureau, 2020). Because the Town's population is below 100,000 and its density is less than 1,000 persons per square mile, Yucca Valley is considered a non-urbanized area under Public Resources Code § 21071 and, accordingly, the project site is located in a non-urbanized setting. Therefore, the analysis below determines if the project would substantially degrade the existing visual character or quality of the site and its surroundings.

As shown in **Section 2.0 Environmental Setting**, the project site is located in a rural setting characterized by a mix of commercial, industrial and residential land uses and vacant land. Specific land uses include a truck storage yard, natural gas truck storage, gas station, convenience store, and single-family residences. Views of the existing streetscape are characterized by low height (one-story) buildings, utilities (including utility lines, poles, and street lights) and landscaping. The project would develop a commercial mini storage facility with one-story buildings that would be similar in height, mass and scale to the surrounding development. Therefore, impacts under this category would be less than significant.

Figure 4.1-1
STATE SCENIC HIGHWAYS



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_1_Scenic_Hwys_2025_07_28.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; Caltrans, 2021; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Scale: 1:316,800

N

0 2.5 5 Miles

0 2.5 5 Kilometers

Legend

- Project Location
- Officially Designated State Scenic Highway
- Eligible State Scenic Highway

Sun Mesa Self-Storage Facility

Scenic Highways and National Byways

UltraSystems environmental•management•planning

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact

Yucca Valley benefits from its proximity to land uses that emit little or no light pollution. The limited lighting in the Morongo Basin and surrounding region preserves the natural night environment and allows for views of astronomical features. The glow of lights in urbanized areas brightens the night sky, and excessive light at night can interrupt natural cycles and behavior of both humans and wildlife. Focusing lights where they are needed for public safety and direction reduces light pollution and glare, allowing the sky to be observed and enjoyed in a more natural state. Preservation of dark skies continues to be a priority for the Town and will be a consideration in future project design as the community grows (Town of Yucca Valley, 2014, p. 5-34).

The project would introduce interior building lights and exterior lights for security and visibility purposes. However, the project lighting would adhere to Chapter 8.70 Outdoor Lighting of the Town's Municipal Code, which ensures less than significant light, glare and views of the night sky. Therefore, with adherence to the Municipal Code, impacts regarding light and glare would be less than significant.

4.2 Agriculture and Forestry Resources

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

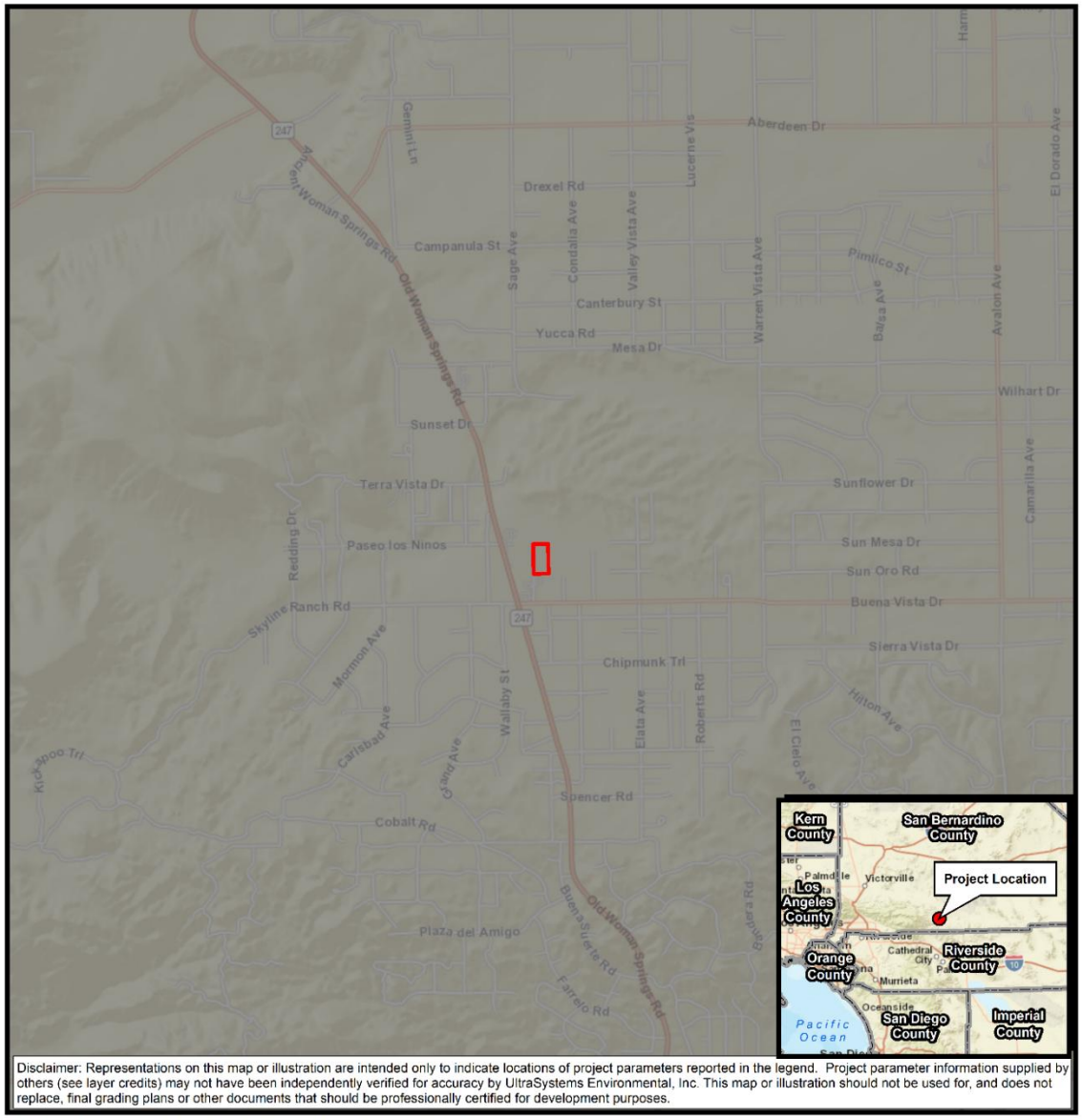
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

<u>No Impact</u>

The project site and surrounding uses are designated by the Division of Land Resource Protection (DLRP) as "Out of Survey Area" (see **Figure 4.2-1** below), which is land that falls outside of the Natural Resources Conservation Service (NRCS) soil survey. Out of Survey Area is not mapped by the Farmland Mapping & Monitoring Program (FMMP).

Therefore, no farmland shown on the maps prepared pursuant to the FMMP would be converted to non-agricultural use and no impacts would occur.

Figure 4.2-1
IMPORTANT FARMLAND CATEGORIES



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

No Impact

The project site is zoned Industrial (I) and is not zoned for agricultural use. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. Williamson Act contracts are made only on land within agricultural reserves; the project site is not within an agricultural reserve. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

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

No Impact

The project site is zoned Industrial (I); the site is not zoned for forest, timberland, or timberland production use. Therefore, project development would not conflict with zoning for forest land or timberland, and no impact would occur.

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

No Impact

The project site and surroundings are not cultivated for forest resources. Therefore, project development would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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

No Impact

The project site is vacant, and there are no residences surrounding the project site. No important farmland is near the project site, and no forest land is on or near the site. Therefore, project development would not indirectly cause conversion of farmland to non-agricultural use or conversion of forest land to non-forest use, and no impacts would occur.

4.3 Air Quality

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			**X**	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?			**X**	
c) Expose sensitive receptors to substantial pollutant concentrations?			**X**	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			**X**	

The following analysis of the proposed project's Air Quality impacts is based substantially on a memorandum prepared by LSA Associates, Inc (LSA) on September 16, 2025: *Air Quality, Energy, and Greenhouse Gas Technical Memorandum for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California* (LSA., 2025a). This memorandum is included as **Appendix B**. Attachment B to the memorandum includes results of the model (CalEEMod 2022.1.1.28) that LSA used to estimate the proposed project's air pollutant emissions.[5]

4.3.1 Pollutants of Concern

Criteria pollutants are air pollutants for which acceptable levels of exposure can be determined and an ambient air quality standard has been established by the U.S. Environmental Protection Agency (USEPA) and/or the California Air Resources Board (ARB). The criteria air pollutants of concern are nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter (PM_{10} and $PM_{2.5}$), sulfur dioxide (SO_2), lead (Pb), and ozone, and their precursors, such as reactive organic gases (ROG) (which are ozone precursors). Since the Yucca Valley Sun Mesa Self-Storage Facility Project (project) would not generate appreciable SO_2 or Pb emissions,[6] the analysis doesn't need to include those two pollutants. The following is a description of the air pollutants of concern and their associated health effects.

The project is in the southwestern San Bernardino County portion of the Mojave Desert Air Basin (MDAB), for which the Mojave Desert Air Quality Management District (MDAQMD) is substantially responsible for air pollution control. **Table 4.3-1** shows the attainment status of the MDAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California

5 See **Section 4.8.6**.
6 Sulfur dioxide emissions will be below 0.05 pound per day during construction and operations.

Ambient Air Quality Standards (CAAQS). Presented below is a description of the air pollutants of concern and their known health effects.

Nitrogen oxides (NO_X) serve as integral participants in the process of photochemical smog production and are precursors for certain particulate compounds that are formed in the atmosphere and for ozone. A precursor is a directly emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an ambient air quality standard (AAQS) has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more AAQSs. When NO_X and ROG are released in the atmosphere, they can chemically react with one another in the presence of sunlight to form ozone. The two major forms of NO_X are nitric oxide (NO) and NO_2. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown, pungent gas formed by the combination of NO and oxygen. NO_2 acts as an acute respiratory irritant and eye irritant and increases susceptibility to respiratory pathogens (USEPA, 2025a).

Table 4.3-1
FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification	State Classification
Ozone (O_3)	Nonattainment[a]	Nonattainment
Particulate Matter (PM_{10})	Nonattainment[b]	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Attainment/Unclassified	Nonattainment[a]
Carbon Monoxide (CO)	Attainment/Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment/Unclassified	Attainment
Sulfur Dioxide (SO_2)	Attainment/Unclassified	Attainment
Lead (Pb)[a]	Attainment/Unclassified	Attainment
All Others	N/A	Attainment/Unclassified

Source: MDAQMD, 2024.
[a] Only the southwest corner of the desert portion of San Bernardino County is Nonattainment.
[b] Only the San Bernardino County portion is Nonattainment.

Carbon monoxide (CO) is a colorless, odorless, non-reactive pollutant produced by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the project location, automobile exhaust accounts for most CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of

excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions. High concentrations are lethal (USEPA, 2025c).

Particulate matter (PM) consists of finely divided solids or liquids, such as soot, dust, aerosols, fumes, and mists. Primary PM is emitted directly into the atmosphere from activities such as agricultural operations, industrial processes, construction and demolition activities, and entrainment of road dust into the air. Secondary PM is formed in the atmosphere from predominantly gaseous combustion by-product precursors, such as sulfur oxides, NO_X, and ROGs.

Particle size is a critical characteristic of PM that primarily determines the location of PM deposition along the respiratory system (and associated health effects) as well as the degradation of visibility through light scattering. In the United States, federal and state agencies have focused on two types of PM. PM_{10} corresponds to the fraction of PM no greater than 10 micrometers in aerodynamic diameter and is commonly called respirable particulate matter, while $PM_{2.5}$ refers to the subset of PM_{10} of aerodynamic diameter smaller than 2.5 micrometers, which is commonly called fine particulate matter.

PM_{10} and $PM_{2.5}$ deposition in the lungs results in irritation that triggers a range of inflammation responses, such as mucus secretion and bronchoconstriction, and exacerbates pulmonary dysfunctions, such as asthma, emphysema, and chronic bronchitis. Sufficiently small particles may penetrate the bloodstream and impact functions such as blood coagulation, cardiac autonomic control, and mobilization of inflammatory cells from the bone marrow. Individuals susceptible to higher health risks from exposure to PM_{10} airborne pollution include children, the elderly, smokers, and people of all ages with low pulmonary/cardiovascular function. For these individuals, adverse health effects of PM_{10} pollution include coughing, wheezing, shortness of breath, phlegm, bronchitis, and aggravation of lung or heart disease, leading, for example, to increased risks of hospitalization and mortality from asthma attacks and heart attacks (USEPA, 2025d).

Reactive organic gases (ROG) are defined as any compound of carbon, excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. It should be noted that there are no state or national ambient air quality standards for ROG because ROGs are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formation of ozone. ROGs are also transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility. The term "ROG" is used by the ARB for this air quality analysis and is defined the same as the federal term "volatile organic compound" (VOC).

Ozone is a secondary pollutant produced through a series of photochemical reactions involving ROG and NO_X. Ozone creation requires ROG and NO_X to be available for approximately three hours in a stable atmosphere with strong sunlight. Because of the long reaction time, peak ozone concentrations frequently occur downwind of the sites where the precursor pollutants are emitted. Thus, ozone is considered a regional, rather than a local, pollutant. The health effects of ozone include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. Ozone is also damaging to vegetation and untreated rubber (USEPA, 2025e).

4.3.2 Climate/Meteorology

Air quality is affected by both the rate and location of pollutant emissions, and by meteorological conditions that influence the movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The MDAB is an assemblage of mountain ranges interspersed with long, broad valleys that often contain dry lakes. Many of the lower mountains that dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. The Basin encompasses desert portions of Kern, Los Angeles, Riverside, and San Bernardino counties. It is surrounded by national forests to the south and west and desert to the north and east.

The MDAB is classified as a dry-hot desert (BWh), with portions classified as dry-very hot desert (BWhh), to indicate that at least three months have maximum average temperatures over 100.4 degrees Fahrenheit (°F) (MDAQMD, 2020a, p. 6-7).

The nearest meteorological station is the Joshua Tree station (#044405, latitude 34.1333°, longitude: -116.3166°) (WRCC, 2016), which is approximately 6.35 miles southeast of the project site, with a period of record from June 1, 1959, to June 10, 2016. The average high and low temperatures recorded there are 79.6°F and 51.2°F, respectively. Average winter (December, January, and February) high and low temperatures are 60.63°F and 37.07°F, respectively, and average summer (June, July, and August) high and low temperatures are 98.47°F and 66.97°F, respectively. The annual average of total precipitation is 4.69 inches, which occurs mostly during the winter and relatively infrequently during the summer. Monthly precipitation averages 0.63 inch during the winter (December, January, and February), 0.23 inch during the spring (March, April, and May), 0.42 inch during the fall (September, October, and November), and 0.28 inch during the summer (June, July, and August).

4.3.3 Local Air Quality

The project site is served by four MDAQMD monitoring stations. The nearest station that monitors ozone is the Hesperia-Olive Street air monitoring site (ARB Number 36201), 50 miles west at 17288 Olive Street in Hesperia. The nearest station that monitors PM_{10} is the Lucerne Valley-Middle School air monitoring site (ARB No. 36208), at 33233 Rabbit Springs Road in Lucerne Valley, about 35 miles northwest of the project. The nearest station that monitors $PM_{2.5}$ is the Big Bear City air monitoring site (ARB No. 36001), 501 West Valley Boulevard, in Big Bear, about 25 miles northwest of the project. The nearest station that monitors NO_2 is the Victorville air monitoring site (ARB No. 36306), at 14306 Park Avenue in Victorville, about 56 miles northwest of the project (ARB, 2025).

This was updated using the LSA AQ Memorandum (August 2025) and iADAM Air Resource Board (ARB, 2025).

The ambient air quality data in the project vicinity, as recorded from 2022 through 2024, along with applicable standards, are shown in **Table 4.3-2**. The data in the table were updated from those reported in the LSA Air Quality, Energy, and Greenhouse Gas Technical Memorandum (LSA, 2025a).

Table 4.3-2
AMBIENT AIR QUALITY MONITORING DATA

Air Pollutant	Standard/Exceedance	2022	2023	2024
Ozone – Hesperia-Olive Street	Max. 1-hour Concentration (ppm) Max. 8-hour Concentration (ppm) # Days > Federal 8-hour Std. of 0.070 ppm # Days > California 1-hour Std. of 0.09 ppm # Days > California 8-hour Std. of 0.070 ppm	0.108 0.090 49 11 52	0.110 0.098 53 11 54	0.121 0.106 66 14 70
PM_{10} – Lucerne Valley-Middle School	Max. 24-hour Concentration (µg/m^3) Est. # Days > Fed. 24-hour Std. of 150 µg/m^3 Federal Annual Arithmetic Mean (12 µg/m^3)	60.2 ND 21.4	112 0 19.2	105 0 20.9
$PM_{2.5}$ - Big Bear City-501 W. Valley Blvd	Max. 24-hour Concentration (µg/m^3) # Days > Fed. 24-hour Std. of 35 µg/m^3 State Annual Average (12 µg/m^3)	31.6 0 8.3	21 0 ND	372.1 8.7 ND
NO_2 – Victorville-14306 Park Avenue	Max. 1-hour Concentration (ppm) State Annual Average (0.030 ppm) # Days > California 1-hour Std. of 0.18 ppm	0.060 0.012 0	0.060 0.010 0	0.050 0.010 0

Source: ARB, 2025.
ND - There was insufficient (or no) data available to determine the value.

4.3.4 Regulatory Setting

Under the Federal Clean Air Act and the California Clean Air Act (CCAA),[7] the MDAQMD has adopted a variety of attainment plans for a variety of nonattainment pollutants. The District has primary responsibility for regulating stationary sources of air pollution located within its jurisdictional boundaries. It implements air quality programs required by state and federal mandates, enforces rules and regulations based on air pollution laws and educates businesses and residents about their role in protecting air quality and the risks of air pollution (MDAQMD, 2022).

The 1995 Final Mojave Desert Planning Area, Federal Particulate Matter (PM_{10}) Attainment Plan (MDAQMD, 1995) was adopted by the MDAQMD board on July 31, 1995. A Certification of District Measures to Reduce PM Pursuant to Former Health & Safety Code § 39614(d) was received and filed by the ARB on January 27, 2020 (MDAQMD, 2020b). The 2008 MDAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area) was adopted by the MDAQMD Board. The USEPA designated the Western Mojave Desert area as non-attainment for the 8-hour ozone National Ambient Air Quality Standard (NAAQS) pursuant to the provisions of the Federal Clean Air Act (FCAA). A portion of the MDAQMD is included in the Western Mojave Desert non-attainment area. The most recent attainment plan that was approved by USEPA is the MDAQMD 2008 Ozone Attainment Plan adopted in 2008 (MDAQMD, 2008). The most recently adopted State plan is the 1996 Triennial Revision to the 1991 Air Quality Attainment Plan.

4.3.5 Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to

7 CCAA of 1988.

certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the MDAQMD considers a sensitive receptor to be a receptor such as a residence, schools, daycare centers, playgrounds and medical facilities.

The nearest sensitive receptors include a single-family home located southeast of the project site, approximately 200 feet from the project site boundary.

4.3.6 Applicable Mojave Desert Air Quality Management District Rules

Rule 403 (Fugitive Dust Control Rule)

During construction, the project would be subject to the MDAQMD Rule 403 (fugitive dust control) (MDAQMD, 2020c). The purpose of Rule 403 is to reduce the amount of PM_{10} entrained in the ambient air from anthropogenic fugitive dust sources by requiring the implementation of dust prevention, reduction, and mitigation measures. The rule applies to construction and demolition activities that disturb at least five acres of non-residential land or 10 acres of residential land, or that involve the handling or relocation of more than 2,500 cubic yards of bulk material on three consecutive days. Since the proposed project is an approximately 4.34-acre non-residential site, Rule 403 applies.

The rule prohibits any person from causing or allowing visible fugitive dust emissions to remain airborne beyond the property line of the emission source, except during high wind conditions (i.e., sustained wind speeds exceeding 25 miles per hour or average wind speeds over 15 miles per hour). It also prohibits construction-related activities from causing incremental PM_{10} concentrations to exceed 100 micrograms per cubic meter, based on a minimum of five hours of sampling using federal reference method samplers located upwind and downwind at the property boundary.

Rule 403 requires the project owner/operator to obtain and maintain a District-approved Dust Control Plan (DCP) before the start of any active operations. This plan must outline specific measures to prevent visible dust emissions, such as periodic watering of disturbed areas, use of chemical dust suppressants, timely stabilization of inactive surfaces, coverage of haul trucks, prevention and cleanup of track out onto paved roads, and reduced grading activity during high wind conditions.

Rule 1113 (Architectural Coatings)

Construction of this project will include the application of architectural coatings and be subject to MDAQMD Rule 1113 (Architectural Coatings). Rule 1113 requires anyone who supplies, sells, offers for sale, manufactures, blends or repackages any architectural coating for use within the MDAQMD, as well as any person who applies or solicits the application of any architectural coating within the District, to use coatings that contain VOC less than or equal to the VOC limits specified in Table 1 of the rule.

4.3.7 Impact Analysis

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

Less than significant Impact

The project is compatible with the general plan land use and zoning discussed in detail in **Section 4.11**. The air quality plans are based upon existing and projected land uses in the planning area. The most recent air quality plan is the MDAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area), which was adopted on June 9, 2008. The project is compatible with that plan.

The MDAQMD has developed criteria in the form of emissions thresholds for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the NAAQS and/or whether the project is in conformity with plans to achieve attainment. **Table 4.3-3** shows MDAQMD CEQA significance thresholds for both construction and operation. A project is considered to have a regional air quality impact if emissions from its construction and/or operational activities exceed the corresponding MDAQMD significance thresholds.

Table 4.3-3
MDAQMD THRESHOLDS OF SIGNIFICANCE FOR CRITERIA POLLUTANTS

Pollutant	Emission Threshold (lbs/day)	Emission Threshold (short tons/year)
Volatile Organic Compounds (VOC)	137	25
Nitrogen Oxides (NO_x)	137	25
Carbon Monoxide (CO)	548	100
Sulfur Oxides (SO_x)	137	25
Particulate Matter (PM_{10})	82	15
Fine Particulate Matter ($PM_{2.5}$)	65	12

Source: MDAQMD, 2020a, Table 6.

Regional Construction Emissions

These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the project site) would primarily generate NO_X emissions. The quantity of emissions generated daily would vary, depending on the amount and types of construction activities occurring at the same time.

Estimated criteria pollutant emissions from the project's onsite and offsite project construction activities were calculated by LSA (September 2025) using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.28. CalEEMod is a planning tool for estimating emissions related to land use projects. Model-predicted project emissions are compared with applicable thresholds to

assess regional air quality impacts. Offroad construction equipment information was supplied by the client, but CalEEMod defaults were used for onroad construction traffic inputs.

As shown in **Table 4.3-5**, the project's annual emissions and daily emissions would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction.

Table 4.3-5
MAXIMUM ANNUAL REGIONAL CONSTRUCTION EMISSIONS

Construction Year	Maximum Regional Pollutant Emissions					
	VOCs	NO_X	CO	SO_X	Total PM_{10}	Total $PM_{2.5}$
Pounds Per Day						
Site Preparation	3.7	36.1	34.0	<0.1	6.9	4.2
Grading	2.0	18.3	19.7	<0.1	2.9	1.7
Trenching	0.4	2.6	3.8	<0.1	0.2	0.1
Building Construction	1.3	11.1	16.6	<0.1	1.1	0.6
Paving	0.8	6.6	10.5	<0.1	0.5	0.3
Architectural Coating	9.7	0.9	2.4	<0.1	0.2	0.1
Maximum (lbs/day)	11.0	36.1	34.0	<0.1	6.9	4.2
MDAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Exceeds?	No	No	No	No	No	No
Tons Per Year						
2024	0.1	0.5	0.5	<0.1	0.1	<0.1
2025	0.1	0.9	1.3	<0.1	0.1	<0.1
2026	0.3	0.7	1.1	<0.1	0.1	<0.1
Maximum (tons/year)	0.3	0.9	1.3	<0.1	0.1	<0.1
MDAQMD Thresholds	25	25	100	25	15	12
Significant?	No	No	No	No	No	No

Source: Calculated by LSA (September 2025) with CalEEMod (Version 2022.1.1.28).

Regional Operational Emissions

The proposed project will develop approximately 541 self-storage units within four types of buildings, referred to as Type A, Type B, Type C, and Type D. A manager's office would be designated as Type E. Each type of building would consist of varying storage unit sizes. Operational emissions generated by area sources, motor vehicles, and energy demand would result from the normal day-to-day activities of the project. The results of these calculations are presented in **Table 4.3-6**. As seen in the table, for each criteria pollutant, operational emissions would be below the pollutant's MDAQMD significance threshold. Therefore, regional operational emissions would be less than significant.

Table 4.3-6
MAXIMUM ANNUAL PROJECT OPERATIONAL EMISSIONS

Emission Type	Pollutant Emissions					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Pounds Per Day						
Mobile Sources	0.8	0.9	7.9	<0.1	1.5	0.4
Area Sources	2.8	<0.1	4.1	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	3.6	0.9	12.0	<0.1	1.5	0.4
MDAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Significant?	No	No	No	No	No	No
Tons Per Year						
Mobile Sources	0.1	0.2	1.2	<0.1	0.3	0.1
Area Sources	0.5	<0.1	0.4	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	0.6	0.2	1.6	<0.1	0.3	0.1
MDAQMD Thresholds	25	25	100	25	15	12
Significant?	No	No	No	No	No	No

Source: Calculated by LSA (September 2025) with CalEEMod (Version 2022.1.1.28).

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

Less Than Significant Impact

Since the MDAB is currently in federal nonattainment for ozone and $PM_{2.5}$ and state nonattainment for ozone and PM_{10}, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. However, as discussed above, the mass daily and annual construction and operational emissions generated by the project would not exceed any of the MDAQMD's significance thresholds. Therefore, the project would not result in a cumulatively considerable net increase in emissions of the pollutants for which the MDAB is in nonattainment. Thus, cumulative air quality impacts associated with the project would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact

Construction of the project would generate short-term and intermittent emissions. Following the MDAQMD's CEQA Guidelines (MDAQMD, 2020a), residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive land uses.

The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated (MDAQMD, 2020a):

- Any industrial project within 1,000 feet.
- A distribution center (40 or more trucks per day) within 1,000 feet.

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

The proposed project entails the development of self-storage units; it does not meet the criteria listed above. Thus, the impacts on sensitive receptors would be less than significant.

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

Less than Significant Impact

A project-related significant adverse effect could occur if the construction or operation of the proposed project would result in the generation of odors that would be perceptible in adjacent sensitive areas. Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction associated with the proposed project's long-term operational uses. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the construction and are thus considered less than significant. Therefore, the project would not create substantial objectionable odors and this impact would be less than significant.

4.4 Biological Resources

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

4.4.1 Methodology

This section is based on the results of a desktop analysis using USGS topographic maps, current aerial imagery, as well as the following sources:

- Biological Resources Assessment for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California *(APN 0597-111-67-0000)* prepared by LSA, October 24, 2025 (LSA, 2025b). See **Appendix C1**.

- Western Joshua Tree Census for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (LSA Project No. 20231230), September 26, 20525 (LSA, 2025c). See **Appendix C2**.

- Rare Plant Survey for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (LSA Project No. 20231230), September 26, 2025 (LSA, 2025d). See **Appendix C3**.

UltraSystems biologists researched readily available information, including relevant literature, databases, agency websites, previously completed reports and management plans, in-house records, and public domain GIS data, maps, and aerial imagery to identify the following: 1) special-status plant and wildlife species, jurisdictional waters, critical habitats, and wildlife corridors that may occur in and near the project site; and 2) local or regional plans, policies, and regulations that may apply to the project. Sources accessed by UltraSystems for analysis of potential impacts within this Initial Study include:

- California Natural Diversity Database (CNDDB, 2025).

- California Native Plant Society's (CNPS) Manual of California Vegetation (MCV) Online Edition (CNPS, 2025).

- USFWS Critical Habitat Portal (USFWS, 2025a).

- CDFW BIOS Habitat Connectivity Viewer (CDFW, 2025a).

- Other sources as cited in the text.

A Biological Study Area (BSA) was defined for the project to include the project site and a 500-foot buffer zone around its perimeter (see **Figure 4.4-1**). UltraSystems biologists did not visit the project site, but the BSA was studied during UltraSystems' desktop analysis to augment the field surveys conducted by LSA.

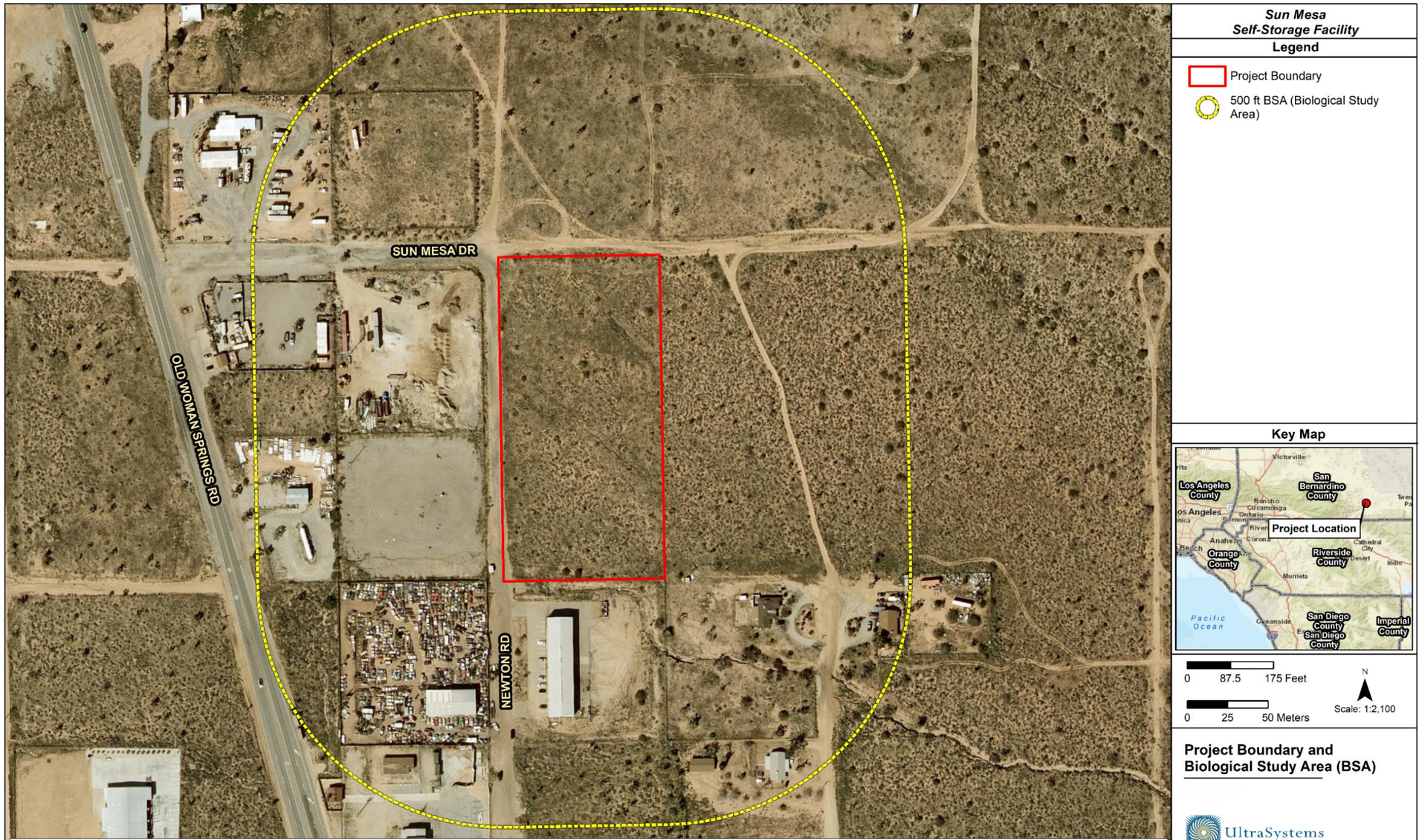
Plant and wildlife species protected by the federal Endangered Species Act (ESA) or by the California Endangered Species Act (CESA) are referred to as *listed species* in this section. Plant and wildlife species not protected under ESA or CESA but still protected by federal agencies, state agencies, local or regional plans and/or nonprofit resource organizations, such as the California Native Plant Society (CNPS), are referred to as *sensitive species* in this section. The term *special-status species* is used when collectively referring to both listed and sensitive species.

4.4.1.1 Environmental Setting

The topography of the biological study area (BSA) and project site are relatively flat, with slight inclines on the north to south plane. The north end of the BSA reaches approximately 3,726 feet above mean sea level (amsl), whereas the southern portion of the BSA reaches approximately 3,710 feet amsl. The project is situated on the southeast corner of Newton Lane and Sun Mesa Drive; it is surrounded by industrial, commercial, and mostly vacant residential areas.

The project site is in the *Yucca Valley North, California* 7.5-minute series topographic quadrangle map in Section 13 of Township 1 North, Range 5 East, San Bernardino Baseline and Meridian (USGS, 2025).

Figure 4.4–1
PROJECT LOCATION AND BIOLOGICAL STUDY AREA (BSA)



The project site and BSA are in the Mojave Basin and Range Major Land Resource Area (MLRA) of the Western Range and Irrigated Region of the U.S. The Mojave Basin and Rangle MLRA is the transition from the hot Sonoran Desert in the south to the cool Great Basin Desert in the north. This area contains both high and low deserts, often within short distances of one another (USDA NRCS, 2022). A strong orographic effect limits the amount of coastal humidity and precipitation entering the Mojave Basin. Precipitation occurs primarily in winter and early spring. Drought years are common, and high amounts of annual precipitation often occur in single storm events. Summers are hot and dry with irregular and sparse, high-intensity, convective thunderstorms (USDA NRCS, 2022).

4.4.1.2 Discussion of Impacts

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

<u>Less Than Significant with Mitigation Incorporated</u>

Special Status Plants

LSA identified eight special-status plant species with potential to occur within the project vicinity. One species, triple-ribbed milk-vetch (*Astragalus tricarinatus),* is federally protected, whereas another species, western Joshua tree (*Yucca brevifolia),* is state candidate threatened, and the remaining species are sensitive (not federally or state-listed). LSA's analysis is based on CNDDB data from the *Yucca Valley North, Yucca Valley South, Joshua Tree North, Joshua Tree South, Rimrock, Goat Mountain,* and *Landers, California* quadrangles (LSA, 2025b).

Of these eight species, western Joshua tree (*Yucca brevifolia)* was present onsite in November 2023, and the other seven species were not observed in a focused rare plant survey conducted in May 2024. The Joshua tree census conducted by LSA biologists on November 1, 2023, determined 98 Joshua trees were : 87 Joshua trees were on the project site and there were 11 in the buffer area.(**Figure 4.4-2**; LSA, 2023). LSA biologists surveyed for the presence/absence of San Bernardino milk-vetch (*Astragalus bernardinus*), triple-ribbed milk-vetch (*Astragalus tricarinatus*), Pinyon rock cress (*Boechera dispar*), Pioneertown linanthus (*Linanthus bernardinus*), little San Bernardino mountains linanthus (*Linanthus maculatus* ssp*. maculatus*), Robinson's monardella (*Monardella robisonii*), Latimer's woodland gilia (*Saltugilia latimeri*), and any other special-status species detectable during the time of the surveys (LSA, 2025b). The only special-status species LSA found at the time of either survey (November 2023 or May 2024) is western Joshua tree; no additional special-status species (i.e., species beyond the eight listed) were observed onsite (LSA, 2025b; LSA, 2025c).

Five special-status species were determined to occur within two miles of the BSA by UltraSystems (**Figure 4.4-3**). These five species (i.e., little San Bernardino mountains, Pioneertown linanthus, Robinson's monardella, San Bernardino milk-vetch, and Pinyon rock cress) were considered within LSA's analysis.

It is important to note that the 2024 focused rare plant surveys followed an above average rainfall season (UltraSystems 2025a, 2025c). Therefore, the focused rare plant survey results may be limited by lack of data concerning certain plant taxa, especially for annual or biennial plant species. Although surveys were conducted during the general peak bloom period for the species of interest, the lack of precipitation preceding the 2025 survey season precludes an optimal floristic inventory.

Western Joshua Tree

The western Joshua tree is a State Candidate Threatened species native to California. Tree size and growth form vary with site and climate conditions. In California, the western Joshua tree is an evergreen tree that is present in discontinuous populations within the western Mojave Desert and extends north and east into the southwestern Great Basin. The western Joshua tree typically grows between heights of 16.4 to 66 feet, rarely exceeding 33 feet. Western Joshua trees typically have one main stout stem or trunk that measures 3.3 to 10 feet in diameter and have an expanded base (CDFW, 2025b).

Western Joshua trees are typically found within the Mojave Desert and Great Basin ecoregions on landforms such as alluvial fans, bajadas, flats, ridges, mesas, and gentle to moderate slopes. They benefit from soils with bimodal textures with coarse sand and fine silts that are able to retain soil moisture. Additionally, western Joshua trees are sensitive to temperature and precipitation, which are factors that can determine whether or not the tree or juvenile sprout will be able to survive in a landscape. Important climate factors for these trees are annual heat/moisture index, winter minimum temperature, and mean annual precipitation (CDFW, 2025b)

LSA conducted a Joshua Tree Census on November 1, 2023 (see **Appendix C2**, *Western Joshua Tree Census for the Sun Mesa (Billings) Mini Storage Project*; LSA 2023). The study area for the census includes the 4.34-acre project site plus a 49-foot buffer area around the site (see **Figure 4.4-2**). Each living or dead Joshua tree in the study area was assigned a unique identification number, tagged, photographed, and mapped using Global Positioning System (GPS) technology (datum WGS 84). Each Joshua tree stem or trunk arising from the ground was considered an individual tree. For each Joshua tree, the arborist recorded size class, maturity, and flowering/fruiting status.

The census recorded 98 Joshua trees onsite; 87 Joshua trees on the project site and 11 in the buffer area. Construction of the project would result in the removal of all 98 Joshua trees on the project site and in the buffer area. Impacts to Joshua tree would be potentially significant.

Mitigation Measures

Unless otherwise noted, the project applicant does not plan to transplant or retain any of the 98 Joshua trees on the project site and in the buffer area. All impacts to this parcel will be permanent, as no remaining undeveloped land is proposed by this project. The implementation of the following measures would reduce impacts to less than significant levels.

BIO-1: Biological Monitor

(a) A biological monitor will be onsite to monitor activities that result in the clearing or grading of areas known to contain sensitive biological resources, such as western Joshua tree habitat, as well as ground-disturbing activities that impacts do not exceed the limits of construction and minimize the likelihood of inadvertent impacts to special-status plant and wildlife species.

(b) The biological monitor will ensure that all biological mitigation measures, best management practices (BMPs), avoidance and protection measures described in the relevant project permits and reports are in place and are adhered to. Monitoring will cease when the sensitive habitats and jurisdictional areas have been cleared or impacted. The biological monitor will take photographs

throughout the construction process. Observations of special-status species will be recorded in monitoring logs, mapped, and special-status species records will be submitted to the California Natural Diversity Database (CNDDB) within five working days of the sightings, and CDFW will be provided with copies of the CNDDB forms and survey maps. Monitoring logs will be completed for each day of monitoring.

(c) The biological monitor will have the authority to halt all construction activities and all non-emergency actions if listed species are identified on the project site and will be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If needed, and if authorized by the resource agencies, the monitoring biologist will relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if CDFW and/or the USFWS determine that the activity will not result in impacts to the species.

(d) If sensitive biological resources are detected in an area to be impacted, then appropriate measures will be implemented by the biological monitor to avoid impacts (i.e., flag and avoid, erect orange snow fencing, biological monitor present during work, etc.). However, if avoidance is not possible and the sensitive biological resources will be directly impacted by project activities, the biological monitor will mark and/or stake the site(s) and map the individuals on an aerial map and with a GPS unit. The biologist will then contact the appropriate resource agencies to develop additional mitigation measures prior to commencing project activities.

(e) The construction crew will inspect excavated areas daily to detect the presence of trapped wildlife.

BIO-2: Project Limits and Designated Areas

To avoid impacts to sensitive biological resources, the following measures will be implemented by the project proponent, contractors, and biological monitor prior to project staging, and commencement of any ground-disturbing activities or vegetation removal.

a) Project boundary would be set at the minimum size to accomplish necessary work, resulting in minimal impacts to sensitive biological resources and jurisdictional areas.

b) Specifications for the project boundary, limits of construction, project-related parking, storage areas, laydown sites, and equipment storage areas will be mapped and clearly marked in the field with temporary fencing, signs, stakes, flags, rope, cord, or other appropriate markers. All markers will be maintained until the completion of activities in that area.

c) To minimize the amount of disturbance, the construction/laydown areas, parking areas, staging areas, storage areas, spoil areas, and equipment access areas will be restricted to designated areas. To the extent possible, designated

areas will comprise existing disturbed areas (parking lots, access roads, graded areas, etc.).

d) Project-related work limits will be defined, and work crews will be restricted to designated work areas. Disturbance beyond the actual construction zone is prohibited without site-specific surveys.

e) Project related vehicle traffic will be restricted to established roads, staging areas, and parking areas. Travel outside construction zones will be prohibited. If sensitive biological resources are detected in an area to be impacted, then appropriate measures will be implemented to avoid impacts (i.e., flag and avoid, erect orange snow fencing, biological monitor present during work, etc.). However, if avoidance is not possible and the sensitive biological resources will be directly impacted by project activities, the biological monitor will mark and/or stake the site(s) and map the individuals on an aerial map and with a GPS unit. The biologist will then contact the appropriate resources agencies to develop additional avoidance, minimization and/or mitigation measures prior to commencing project activities.

BIO-3: Western Joshua Tree Conservation Act

Prior to the initiation of Joshua trees encroachment, trimming, pruning, or any activity that may result in take of Joshua trees (including removal of live and dead Joshua trees), the project proponent should obtain a California Endangered Species Act (CESA) Incidental Take Permits (ITP) under the western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927.3 and 1927.8). California Fish and Game Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". Mitigation will occur per the stem count per the WJTCA census in lieu fee, or as required by the ITP and WJTCA.

BIO-4: California Desert Native Plants Act

a) Because species of the family Agavaceae (e.g., western Joshua Tree), which have been observed throughout the project site, are covered under § 80073(b) of the California Desert Native Plants Act (CDNPA), any impacts will require a permit issued by the commissioner of the sheriff in San Bernardino County pursuant to Chapter 3 § 80073. Prior to commencement of construction activities, including but not limited to mobilization, fencing, staging, vegetation trimming or removal, or ground-disturbing activities, the project proponent will acquire a permit pursuant to Chapter 3 § 80101 and § 80073 of the California Desert Native Plants Act if any of the following species are observed on the project site:

    a. All species of the family Agavaceae (century plants, nolinas, yuccas)

    b. All species of the family Cactaceae (cacti), except for the plants listed in subdivisions (b) and (c) of Section 80072 which may be harvested under a permit obtained pursuant to that section.

    c. All species of the family Fouquieriaceae (ocotillo, candlewood)

d. All species of the genus Prosopis (mesquites)

e. All species of the genus Cercidium (palos verdes)

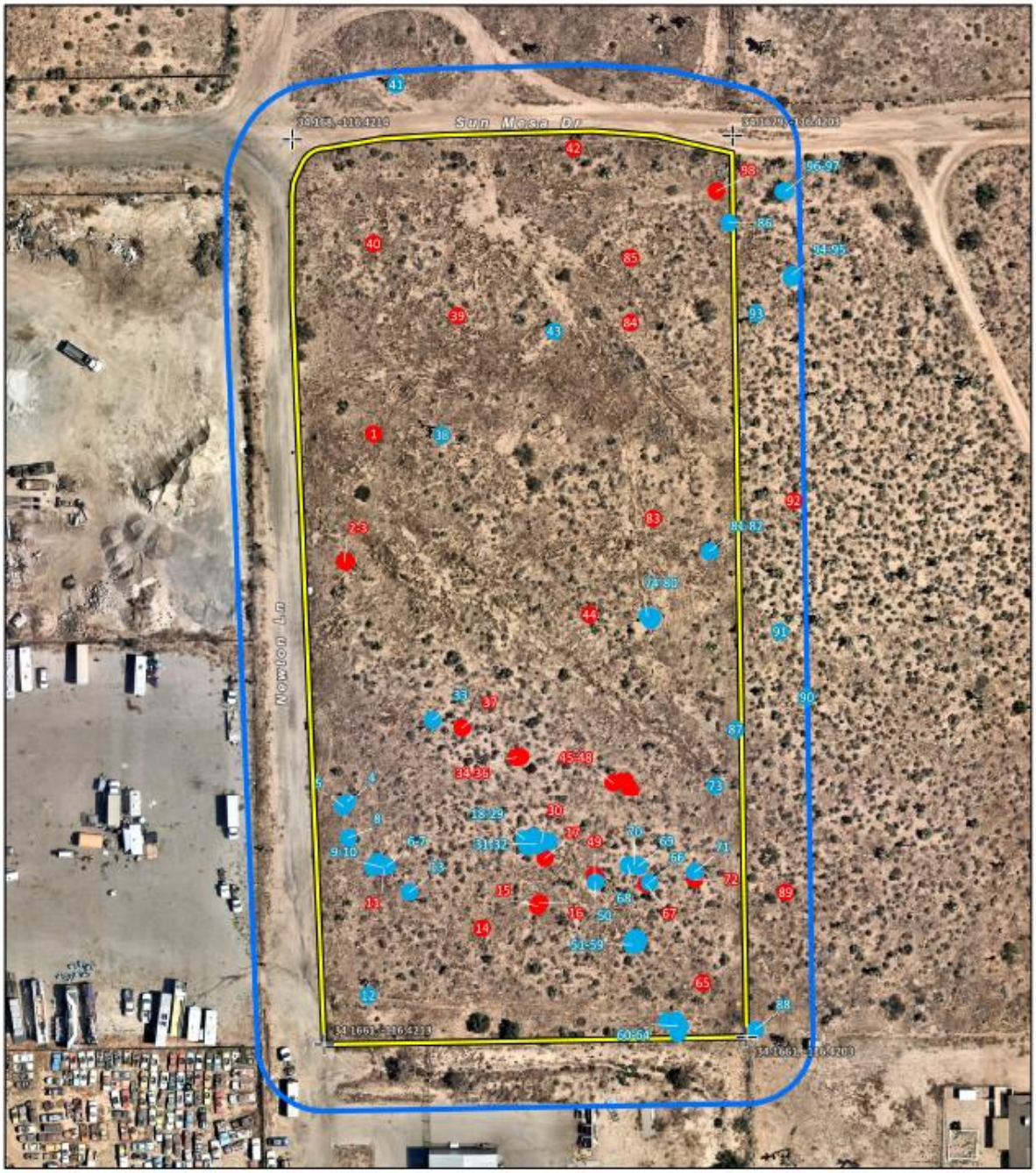
f. *Acacia greggii* (catclaw)

g. *Atriplex hymenelytra* (desert-holly)

h. *Dalea spinosa* (smoke tree)

i. *Olneya tesota* (desert ironwood), including both dead and live desert ironwood.

Figure 4.4-2
JOSHUA TREE CENSUS



LSA

FIGURE 4

Project Area
Study Area
Joshua Trees
Alive
Dead

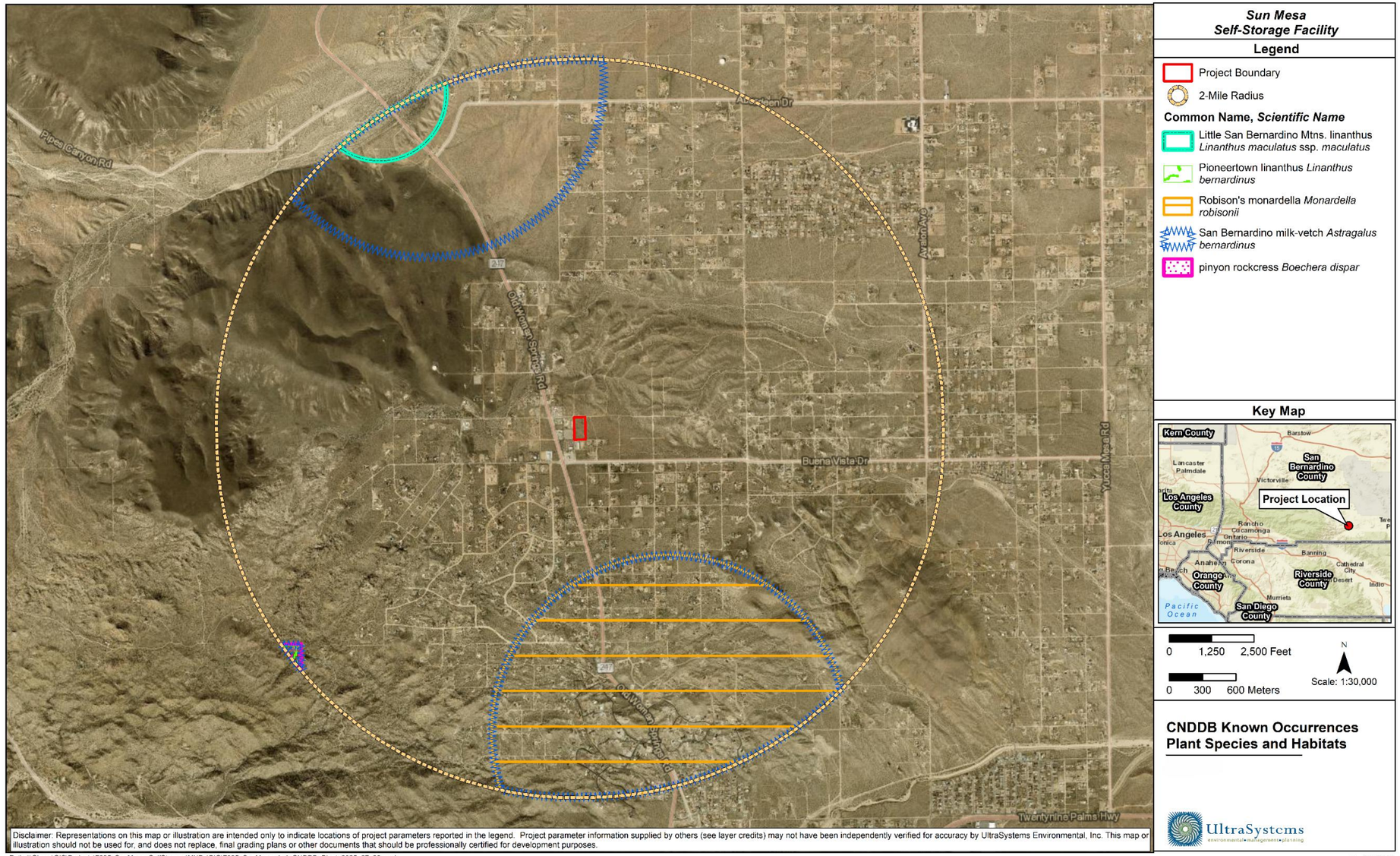
0 14 28
Meters

SOURCE: Nearmap Aerial Imagery (June 12, 2023)

I:\2023\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (8/6/2024)

Sun Mesa (Billings) Mini Storage Project
Joshua Tree Census

Figure 4.4-3
CNDDB KNOWN OCCURRENCES: PLANT SPECIES AND HABITATS



Special-Status Wildlife

LSA identified five special-status wildlife species with potential to occur within the vicinity of the project. Of these species, one is federal and state threatened (Desert tortoise, *Gopherus agassizii),* and one is state candidate threatened/endangered (burrowing owl, *Athene cunicularia*). The remaining three species are special-status and include the loggerhead shrike (*Lanius ludovicianus),* San Joaquin Valley population of Le Conte's thrasher *(Toxostoma lecontei),* and American badger *(Taxidea taxus).* LSA biologists confirmed presence of the loggerhead shrike during the May 2024 field survey and anticipate the remaining species are either not expected to occur or have low potential to occur (LSA, 2025b).

LSA biologists observed California quail *(Callipepla californica),* mourning dove *(Zenaida macroura),* turkey vulture *(Cathartes aura),* loggerhead shrike*,* common raven *(Corvus corax),* house sparrow *(Passer domesticus),* house finch *(Haemorhous mexicanus),* San Diegan tiger whiptail *(Aspidoscelis tigris stejnegeri),* and desert cottontail *(Sylvilagus audubonii)* during the May 2024 survey. LSA adds that the abundant Joshua trees and yucca within the project site may significantly contribute to nesting for native wildlife species, especially birds (LSA, 2025b).

UltraSystems identified two wildlife species within a two-mile radius of the project site (**Figure 4.4- 5**). One of these species, desert tortoise, was considered in LSA's investigations. However, the pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*) was not mentioned in LSA's Biological Resource Assessment LSA, 2025b). UltraSystems biologists determined the pallid San Diego pocket mouse has a moderate potential to occur within the BSA. The pallid San Diego pocket mouse is not a federally or state-listed species, although is ranked by CDFW as either vulnerable (S3) and apparently secure ((S4; combined State rank is S3S4) state-wide (USFWS, 2025b; CDFW, 2025c)).

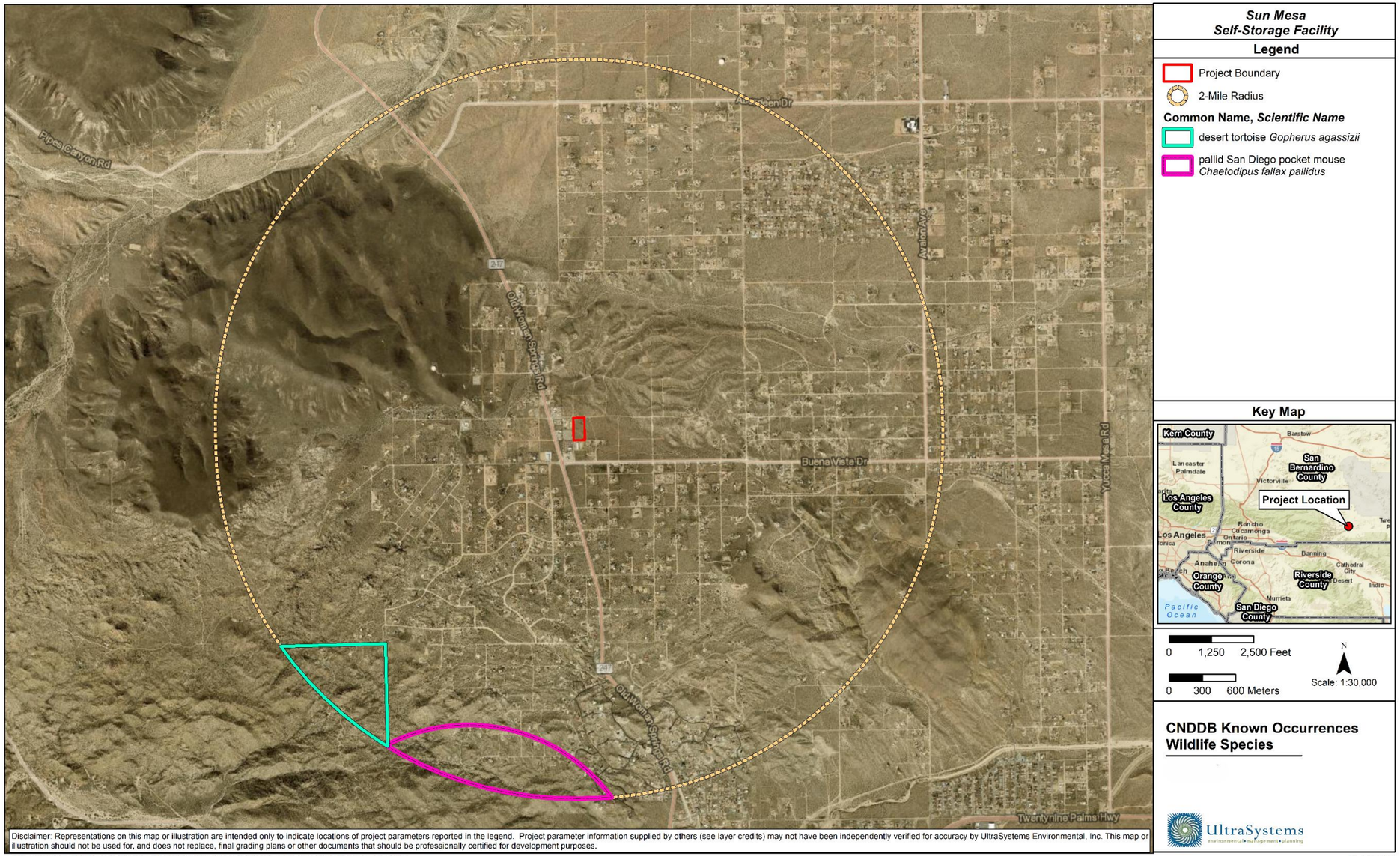
Desert tortoise (Gopherus agassizii)

The desert tortoise occurs in the Mojave, Sonoran, and Colorado deserts in the southwestern United States and the Sonora and northern Sinaloa in Mexico. The designated Mojave population of the desert tortoise is listed as federally and State Threatened and includes those animals living north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Colorado Desert in California (USFWS, 1994 and USFWS, 2011).

Desert tortoises typically occur in desert scrub, desert wash, and Joshua tree habitats below sea level to 7220 feet. Tortoises typically excavate burrows under bushes, and overhanging soil or rock formations (CDFW, 2000). Soils must be friable (easily crumbled) enough for digging burrows, but firm enough so that burrows do not collapse. During the winter, tortoises will opportunistically use burrows of various lengths, deep caves, rock and caliche crevices, or overhangs for cover (USFWS, 2011).

No observations of desert tortoise were made by LSA in the November 2023 or May 2024 surveys. However, desert tortoise is a mobile species, and direct impacts may result from project activities, including (but not limited to) staging, vegetation removal, and grading, Desert tortoises may also seek shelter in the shade of parked construction vehicles and equipment. For these reasons, mitigation is recommended (**BIO-1**, *Biological Monitor*, **BIO-5**, *Worker Environmental Awareness Program*, **BIO-7**, *Pre-Construction Desert Tortoise Survey*).

Figure 4.4-5
CNDDB KNOWN OCCURRENCES: WILDLIFE SPECIES



Burrowing Owl (Athene cunicularia)

The burrowing owl (BUOW) is a small, crepuscular (active at dusk and dawn), ground-inhabiting owl that is found largely throughout the United States (Wilkerson, and Siegel, 2011). Its overall length is about seven to ten inches. Its coloring is sandy brown on its head, back and upper wings, with noticeable white spotting on its back and upper wings (Sibley, 2000). Adults are barred on their breast, while juveniles are buffy with a white collar. The brown and white mottling helps to provide camouflage in their dry habitat. BUOWs have yellow eyes, long legs, a short tail, with relatively long, narrow wings and a flat, round head (Sibley, 2000). Their long legs help them to see over grasses and short vegetation and aid them in catching their prey.

Burrowing owls are the only North American owl species that lives underground; typical BUOW habitat is open, dry, on level to mildly sloping topography with short and sparse vegetation structure and available burrows for nesting and roosting (Gallagher, 1997; Haug et al., 1993; Shuford et al., 2008; Center for Biological Diversity et al., 2024). BUOWs spend most of their time on the ground or on low perch sites such as fence posts and dirt mounds. Typical habitat includes prairies, grasslands, shrub steppe, deserts, and some agricultural areas (Haug et al., 1993). Nesting habitat also includes rolling hills, and occasionally on steep slopes or cliffs (Center for Biological Diversity, 2024). BUOW nesting habitat also occurs in urban landscaped areas and includes ruderal grassy fields, roadsides, airport infields, rural parks, college campuses, golf courses, athletic fields, and other similar areas (Center for Biological Diversity et al., 2024). In California, BUOW nesting habitat also includes fallow agricultural fields, the edges of cultivated fields (e.g., along roads or agricultural canals; Rosenberg and Haley, 2004). They are the only small owls likely to be seen perched in the open daylight (Sibley, 2000).

Though no sign, direct observation, or suitable burrow was observed in the November 2023 or May 2024 surveys, LSA determined burrowing owl are known to commonly occur within the project vicinity. Therefore, LSA recommended a Pre-Construction Presence/Absence Survey for burrowing owl (LSA, 2025b). UltraSystems biologists agree in recommending burrowing owl surveys presented under mitigation measures (**BIO-10,** *Pre-Construction Burrowing Owl Surveys*).

Loggerhead shrike

The loggerhead shrike is a large, predatory songbird. They are known to inhabit and forage over open country within areas of short vegetation and well-spaced shrubs or low trees, particularly those with spines or thorns. They frequent agricultural fields, pastures with fence rows, old orchards, savannas, prairies mowed roadsides, cemeteries, golf courses, riparian areas, open woodland, agricultural fields, desert washes, desert scrub, grassland, broken chaparral and beach with scattered shrubs. They prefer tall shrubs or trees (also fences or power lines) for hunting perches and territorial advertisement; open areas of short grasses, forbs, or bare ground for hunting; and large shrubs or trees for nest placement. Human disturbance does not seem to be a major concern to this species. The shrike is often seen next to well-traveled roads and near houses built in suitable habitat. In California, loggerhead shrikes breed mainly in shrublands or open woodlands with a fair amount of grass cover and areas of bare ground. They often nest in isolated trees or large shrubs.

Le Conte's thrasher

LeConte's thrasher is a passerine in the family Mimidae. This species occurs in the deserts of southeastern California, southern Nevada, extreme southwestern Utah south into west-central and southwestern Arizona, northeastern Baja California, and northwestern Sonora, with recent range

extensions into the Carrizo Plain and Cuyama Valley, much of the San Joaquin Valley, and the Panoche Hills. Occupied habitats are generally moderately to sparsely vegetated by saltbush scrub with bare ground or patches of sparse grasses. Habitat loss and degradation, particularly conversion of habitat to agriculture, are the major threats to populations. They are considered a Species of Special Concern by the CDFW and a Bird of Conservation Concern by the USFWS. Their nests are protected by the MBTA and Fish and Game codes pertaining to native nesting avian species.

American badger

The California Department of Fish and Wildlife (CDFW) considers American badger (*Taxidea taxus*) to be a Species of Special Concern (SSC). The American badger is found in a dry, open stages of a variety of habitats throughout California including woodlands, shrublands, and grasslands. The American badger is a fossorial carnivore and feeds primarily on small fossorial mammals including mice, chipmunks, rats, and particularly ground squirrels and pocket gophers. This species is fossorial and digs its dens in loose, friable soil. American badger is active year-round and has been observed to be diurnal at times or nocturnal.

Breeding and Nesting Birds (Migratory Bird Treaty Act)

The BSA supports trees, shrubs, and other vegetation (including landscaping/ornamental vegetation) that could potentially provide foraging, nesting, and cover habitats to support a diverse assortment of bird species (yearround residents, seasonal residents, and migrants). LSA biologists observed loggerhead shrike during the May 2024 field visits (LSA, 2025b). A majority of the birds observed during the field surveys and those birds that could potentially breed and nest within the project site and BSA are protected by the MBTA, and by Fish and Game Code § 3503, § 3503.5, and § 3513.

Activities which are most likely to result in take of migratory birds during the breeding bird season and when eggs or young are likely to be present include, but are not limited to, clearing or grubbing of bird nesting habitat; excavations and ground movement; or vegetation trimming or clearing. The project has the potential to directly take individual breeding birds, their nests, young, or eggs; therefore, avoidance and minimization are required. Indirect impacts to breeding birds could occur from increased noise, vibration, lighting and dust during construction, which could adversely affect the breeding behavior of some birds and lead to the loss (take) of eggs and chicks, or nest abandonment.

It is anticipated that the project may cause direct and indirect impacts to breeding birds, their nests, young, or eggs. Implementing the recommended avoidance and minimization **BIO-1** through **BIO-4** and **BIO-5** through **BIO-13**, described below, will minimize or avoid potential impacts to breeding birds, their nests, young, or eggs to less than significant levels. Impacts would then be less than significant.

Mitigation Measures

It is possible that impacts, such as unauthorized take or burrow collapse, occur to special-status species due to project activity. With the implementation of **BIO-1** through **BIO-4**, and the following mitigation measures (**BIO-5** through **BIO-12**), impacts are anticipated to be less than significant.

BIO-5: Worker Environmental Awareness Program

Worker Environmental Awareness Program (WEAP) for construction personnel shall be conducted and documented prior to onsite disturbances. The training shall include a discussion of the sensitive biological resources within the project site and the potential presence of special-status species. The WEAP shall also include a discussion of special-status species' habitats, protection measures to ensure species are not impacted by project activities, project boundaries, penalties for non-compliance, and biological conditions outlined in the project permits. All new employees shall be trained before they access the work site. New employees shall be trained and certified by the Construction Supervisor with the approval of the Project Biologist as approved by CDFW. Each trained individual shall be given a distinctive helmet sticker that will identify those who have received training, signed the training log, and demonstrated the required level of environmental awareness.

BIO-6: Construction Best Management Practices

Project work crews will use CASQA (or similar) stormwater BMPs as directed by the project's Storm Water Pollution Prevention Plan (SWPPP). These measures will be identified prior to construction and incorporated into construction operations. The project's Qualified SWPPP Practitioner shall ensure that construction activities will incorporate all applicable BMPs specified in the SWPPP to prevent erosion from water or wind, sedimentation of receiving waters, and introduction of other pollutants, including non-stormwater pollutants, into drainages crossed by or adjacent to the project site, accidental spills in the project site, including laydown yards and parking areas. BMPs will be maintained on a regular basis pursuant to the requirements of the SWPPP.

Bio-7: Pre-Construction Desert Tortoise Survey

Prior to the commencement of project activities, including but not limited to ground disturbance, pre-construction surveys following guidance in the U.S. Fish and Wildlife's (USFWS) 2018 *Preparing for Any Action That May Occur Within the Range of the Mojave Desert Tortoise* (*Gopherus agassizii;* "Guidelines") shall be conducted by an authorized biologist in possession of an active §.10(a)(1)(B) Incidental Take Permit from the USFWS. The Guidelines recommend the applicant contact USFWS prior to surveys. Qualified biologists shall conduct pre-construction surveys for desert tortoise no more than 48 hours prior to initiation of Project activities and after any pause in Project activities lasting 30 days or more. The qualified biologists shall follow USFWS's Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii;* "Field Manual"). The qualified biologist shall record all signs of desert tortoise, such as scat, burrows, carcasses, courtship rings, drinking depressions, and live sightings, as described in the Field Manual. The qualified biologist shall provide a report with a map of the surveyed area (including transects, desert tortoises, and sign) and description of habitat conditions. Should positive survey results occur, the project applicant shall secure an incidental take permit under Section 10 of FESA and State incidental take permit under Section 2081 of the Fish and Game Code.

BIO-8: Pre-construction Wildlife Surveys

Prior to issuance of grading permits, a qualified biologist shall conduct pre-construction surveys within areas of suitable habitat for special-status terrestrial wildlife species identified as having moderate or greater potential to occur onsite. Pre-construction surveys shall be conducted three days before the commencement of construction activities. If construction activities onsite lapse for one week or more, approved work areas will be re-surveyed by the biologist for new occurrences of

the special-status wildlife species. Further consultation with wildlife agencies will be necessary if special-status species are observed onsite and prior to commencing construction activities.

BIO-9: General Wildlife Avoidance and Protection Measures

The project proponent shall implement the following general avoidance and protection measures to protect wildlife.

a) To minimize construction-related mortalities of nocturnally active wildlife species, it is recommended that all non-emergency work be conducted during daylight hours. All unnecessary lights shall be turned off at night to avoid attracting wildlife. Nighttime work (and use of artificial lighting) would not be permitted unless specifically authorized.

b) If any wildlife is encountered during project activities, it will be allowed to freely leave the area unharmed or the biological monitor shall capture the animal, if authorized, and relocate it outside of the construction work limits out of harm's way.

c) Listed wildlife species shall not be captured, handled, or relocated without specific written authorization from CDFW and/or USFWS.

d) Wildlife shall not be disturbed, captured, harassed, or handled, unless to relocate the animal out of imminent threat of injury or death. Animal nests, burrows and dens shall not be disturbed without prior survey and authorization from the biological monitor.

e) Active and inactive nests cannot be removed or disturbed.

f) Contractors, subcontractors, employees, and site visitors shall be prohibited from feeding or collecting wildlife.

g) To avoid the potential for mortality and harassment of wildlife, all non-security related firearms, weapons, and domestic dogs would be prohibited from the project site.

h) Contractors, subcontractors, employees, and site visitors shall inspect their vehicles and equipment for the presence of wildlife prior to moving their vehicles and equipment. The biological monitor shall be contacted if a special-status species is detected and is in danger of being harmed.

i) All steep-walled pitfalls (trenches, holes, bores, and other excavations) greater than two feet deep used during the project would be completely covered at all times except when being actively used, to prevent wildlife entrapment (i.e. reptiles and small mammals). If trenches cannot be covered, escape ramps (maximum slope of 2:1) shall be provided to allow trapped animals to escape. Exclusion fencing shall be installed around the trench or excavation. Trenches shall be inspected and wildlife removed immediately before backfilling.

j) All onsite project workers shall look under their vehicles and equipment before movement. If wildlife is observed, no vehicles or equipment shall be moved until the animal has left the area voluntarily or can be legally relocated.

k) Equipment maintenance, lighting, and staging shall occur only in designated areas, and shall not block or impede wildlife movement.

BIO-10: Pre-Construction Burrowing Owl Surveys

A qualified biologist shall conduct a pre-construction BUOW survey in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012) or current CDFW guidance/protocol if changes to the aforementioned 2012 guidance have occurred. A pre-construction BUOW survey (Take Avoidance Survey) shall be conducted no more than 14 days prior to any site disturbance (grubbing, grading, and construction) and again 24 hours prior to ground disturbing activities.

Although BUOW was not detected on site during the reconnaissance-level surveys, the BSA contains suitable habitat to potentially support BUOW. The qualified biologist shall identify, record, and map with a global positioning system (GPS) unit BUOWs and their sign. Detailed notes and wildlife species encountered during the surveys shall be recorded in field notes.

If an occupied burrow is found (as indicated by the observation of a burrowing owl or the presence of burrowing owl sign), a 250-foot buffer around the burrow shall be staked and flagged and no construction activities will be allowed within the buffer area during the breeding season (February 1 through August 31). The qualified biologist will contact CDFW to assist in the preparation of an Incidental Take Permit (ITP), and development of avoidance, minimization, and mitigation measures, prior to commencing project activities. A relocation program may be necessary and shall be approved by CDFW prior to commencing project activities.

If no BUOWs or signs of BUOWs are observed during the preconstruction surveys and concurrence is received from CDFW, project activities may begin, and no further mitigation shall be required.

BIO-11: Pre-Construction Breeding Bird Survey

If vegetation removal is scheduled within the nesting season, a qualified biologist shall conduct a pre-construction nesting bird survey to maintain compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (§§ 3503 and 3503.5), which prohibit take of nesting birds and nests of migratory and non-game bird species. Nesting season is generally considered to be:

- January 1-July 30 for raptors.
- February 1-September 15 for non-raptors.

a) A qualified biologist will conduct pre-construction surveys no more than five days prior to when project activities (e.g., mobilization, excavation, grading, vegetation removal) are underway. Should a lapse in project activity be greater than five days, a qualified biologist will conduct additional surveys to maintain compliance.

To maximize the detection of nesting birds, surveys must be conducted in work areas (e.g., staging, stockpiling, storage, equipment yards, access roads) during favorable weather conditions. A wide variety of shelters and resources are used by avian species; these include barren ground, grasses, forbs, shrubs, trees, rocky outcrops, and man-made structures (dependent on species and conditions). The qualified biologists will interpret physical signs for nesting structures (e.g., manipulation of materials like mud or grass) and direct signs of life (e.g., courtship behaviors, gathering, swooping, alarm calls, pellets).

b) If nests are encountered, a qualified biologist shall consider individual species tolerance, proximity to construction activity, noise impacts, line-of-sight barriers, and distance (horizontal and vertical) to determine if planned construction activities would impact nesting success. The rate and duration of construction activities shall also be considered should the modification of scheduled activities be required to maintain healthy nesting outcomes.

c) If the qualified biologist determines construction activities shall potentially adversely affect a nest, the biologist must immediately inform the construction manager to halt construction activities (i.e., establish a no-work zone) within a minimum exclusion buffer of 100 feet for songbird nests and 200-500 feet for raptor nests. This no-work zone lawfully avoids the "take" of nesting birds and the mortality of eggs and younglings. Construction activities within the no-work buffer may proceed after a qualified biologist determines the young have successfully fledged the nest and are no longer dependent upon the nest or parents.

d) If federal or state protected species are observed during surveys, USFWS and CDFW shall be consulted to determine the appropriate time for project activities to proceed and what specific measures will be taken to ensure protected species are not impacted.

BIO-12: Pre-Construction Desert Kit Fox and American Badger Surveys

Desert kit fox is a protected species under CCR Title 14, § 460. No more than 14 days prior to the beginning of ground disturbance and/or Project activities, a qualified biologist shall conduct pre-construction surveys to determine if potential desert kit fox burrows/dens are present in the project area. Pre-construction surveys should include transect surveys at a 20-meter transect distance to ensure 100 percent visual coverage of the project area. Surveys may be combined for similar fossorial mammals, such as American badger; combined, concurrent surveys for dissimilar taxa (e.g. plants or birds) shall be prohibited.

Use of wildlife camera monitoring to determine presence/absence and burrow/den use is strongly encouraged, in accordance with CDFW approved methods, including *Remote Camera Trap Installation and Servicing Protocol Citizen Wildlife Monitoring Project 2017 Field Season* (Moskowitz and Huyett, 2017) and *Camera-trapping for conservation: a guide to best-practices* (Oliver R. Wearn & Paul Glover-Kapfer, 2017).

The pre-construction survey reports will include: (1) the number, location, and status determination of potential desert kit fox and/or badger dens identified during the reporting period, (2) occupancy monitoring status, (3) species present, and (4) estimated number of individuals and associated behaviors observed. Desert kit fox

and badger images will additionally be stored on a cloud-based server and additional relevant data will be made available to CDFW upon request.

If the pre-construction surveys confirm occupied desert kit fox habitat, project activities shall be immediately halted, and the qualified biologist shall notify CDFW to develop avoidance, minimization, and mitigation measures within a Desert Wildlife Management Plan.

No disturbance of active dens shall take place when juvenile desert kit fox may be present and dependent on parental care. Sick or injured animals will be reported to CDFW within 24 hours of discovery.

Level of Significance After Mitigation

With the implementation of mitigation measures **BIO-1** through **BIO-13,** implementation of the proposed project would result in less significant impact to special-status plant and wildlife species.

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

Less Than Significant with Mitigation Incorporated

Communities of Concern

LSA noted a disturbed Joshua tree woodland within the entirety of the project site. There are no additional communities of concern immediately near the project site (LSA, 2025b).

Critical Habitat

Literature review determined that no critical habitat, including USFWS-designated critical habitat, occupies the BSA (**Figure 4.4-6**; LSA, 2025b).

Land Cover

LSA classified all of the project site as a Joshua tree woodland, through remarks on disturbed portions making up roadways (LSA, 2025b). Joshua tree woodland *(Yucca brevifolia* Woodland Alliance) generally occurs on gentle alluvial fans, ridges, gentle to moderate slopes. Soils are typically coarse sands, very fine silts, gravel, or sandy loams, and many sites have bimodal soils with both coarse sands and fine silts (CNPS, 2025). LSA reported dominant vegetation to include western Joshua tree (*Yucca brevifolia*), Mojave yucca (*Yucca schidigera*), creosote bush (*Larrea tridentata*), Mediterranean grass (*Schismus* sp.), red brome (*Bromus rubens*), Sahara mustard (*Brassica tournefortii*), shortpod mustard (*Hirschfeldia incana*), and redstem stork's bill (*Erodium cicutarium*). LSA determined the Joshua tree woodland alliance to take up all of the project site; as such, no other plant communities were found present onsite (**Figure 4.4-7**; LSA, 2025b). The Joshua tree woodland alliance (33.170.00) is considered sensitive with a rarity ranking of apparently secure globally and vulnerable state-side (G4/S3; CDFW, 2025d).

The take of Joshua trees is expected during project development. As such, it is recommended that a Joshua Tree Incidental Take Permit be attained by the project proponent (**BIO-3,** *Western Joshua Tree Conservation Act*; described in **Section 4.4[a]**).

Figure 4.4–6
CRITICAL HABITAT

Figure 4.4-7
LAND COVER

LSA

FIGURE 3

Project Area
Photo Points
Land Cover
Joshua Tree Woodland - 4.92 acres

0 15 30
Meters

SOURCE: Nearmap Aerial Imagery (June 12, 2023)

Sun Mesa (Billings) Mini Storage Project
Vegetation, Land Use, and Photo Locations

I:\2023\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (8/7/2024)

Mitigation Measures

It is anticipated that no Joshua trees would be transplanted or retained as part of project activities, therefore all impacts within the project boundary will be permanent. The implementation of **BIO-3** Western Joshua Tree Conservation Act will reduce impacts to less than significant levels.

Level of Significance After Mitigation

The project is not anticipated to have substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Impacts to individual western Joshua trees would be mitigated through the implementation of measures **BIO-1** through **BIO-4** as described in **Section 4.4(a)**; additionally, implementing the recommended avoidance and minimization mitigation measures **BIO-5** and **BIO-6** would minimize or avoid impacts to sensitive vegetation communities to less than significant.

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

No Impact

The project site does not contain waters of the U.S. or State, including wetlands, and would not directly impact jurisdictional waters. Direct, indirect, or permanent impacts to jurisdictional waters are not anticipated as a result of the project.

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

Less Than Significant Impact

LSA concluded that the BSA is not located within connectivity areas, natural landscape blocks, natural areas small, or potential riparian connections (LSA, 2025b).

Although the BSA does not overlap with such areas, the large amount of open space within and surrounding the BSA serves as a wildlife corridor because this area supports habitat and species that would be used as shelter, foraging, or prey by wildlife species moving to the east and north toward adjacent open space.

No direct impacts to wildlife movement corridors or native wildlife nursery sites are anticipated as a result of construction of the project. Project construction would result in temporary, indirect impacts to wildlife movement within areas located adjacent to the project work sites. Temporary indirect impacts would be considered less than significant because they would be temporary and would cease when construction is complete. During project operation, permanent indirect impacts may occur due to increased lighting and human activity; however, wildlife using the adjacent vacant lot would either be acclimated to low levels of human activities and lighting, or they would shift to the north or east, away from the project site. For this reason, permanent indirect impacts are anticipated to be less than significant.

Direct and indirect impacts to wildlife corridors would be either temporary in nature or would not significantly affect use of the area by wildlife for movement, shelter, foraging, or feeding due to the presence of large areas of open space north and east of the project site. Avoidance and minimization measures would not be required.

The project is not anticipated to have significant direct or indirect impacts on wildlife movement corridors or native wildlife nursery sites, and it is anticipated that the project will not adversely modify them. Impacts would be less than significant, and mitigation is not required.

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

Less Than Significant with Mitigation Incorporated

California Desert Native Plants Act Section 80073

Chapter 3, § 80073 of the CDNPA regulates certain species of California desert native plants from unlawful harvesting. The CDNPA protects all species of yuccas (family Agavaceae), all species of cacti (family Cataceae), all species of candlewoods (family Fouquieriaceae), all species of the mesquites (genus *Prosopis*), all species of palos verdes (genus *Cercidium*), catclaw (*Acacia greggii*), desert-holly (*Atriplex hymenelytra*), smoke tree (*Dalea spinosa*), and desert ironwood (*Olneya tesota*). The CDNPA protects these species from harvest unless under a permit issued by the commissioner or the sheriff of the county in which the native plants are growing. There were six species protected by the CDNPA that were observed on the Project Site: silver cholla (*Cylindropuntia echinocarpa*), diamond cholla (*Cylindropuntia ramosissima*), hedgehog cactus (*Echinocereus engelmannii*), catclaw (*Senegalia gregii*), western Joshua tree (*Yucca brevifolia*), and Mojave yucca (*Yucca schidigera*). Western Joshua trees on the site were mapped as part of the Joshua tree census conducted for this project. The remaining five species will need to be surveyed on the Project Site as required for a permit under the CDNPA (LSA, 2025b).

Town of Yucca Valley Development Code Section 9.10.040

Yucca Valley Ordinance, western Joshua tree, Mojave yucca, Parry's nolina (*Nolina parryi*), California juniper (*Juniperus californica*), Our Lord's candle (*Yucca whipplei*), and Pinon pine (*Pinus monophylla*) require a tree removal permit under the Town of Yucca Valley's Development Code Section 9.10.040 (LSA, 2025b). Project activities are likely to impact western Joshua tree, Mojave yucca and California juniper. Section 9.10.040 states that the clearing or removal of native plants from canal, lateral ditch, survey line, building site, or road or other right of way by the landowner or his agent are not subjected to state regulations should they not be transported from the land or offered for sale. Otherwise, the Town shall issue permits for regulated desert native plants (i.e., Mojave yucca, Parry's nolina, California Juniper, our lord's candle, and pinon pine; Town of Yucca Valley, 2025a).

Mitigation Measures

With the implementation of **BIO-3,** *Western Joshua Tree Conservation Act***, BIO-4,** *California Desert Native Plants Act* (see **Section 4.4[a]**), and the following mitigation measures, impacts are anticipated to be less than significant.

BIO-13: Protective Fencing of No Work Areas

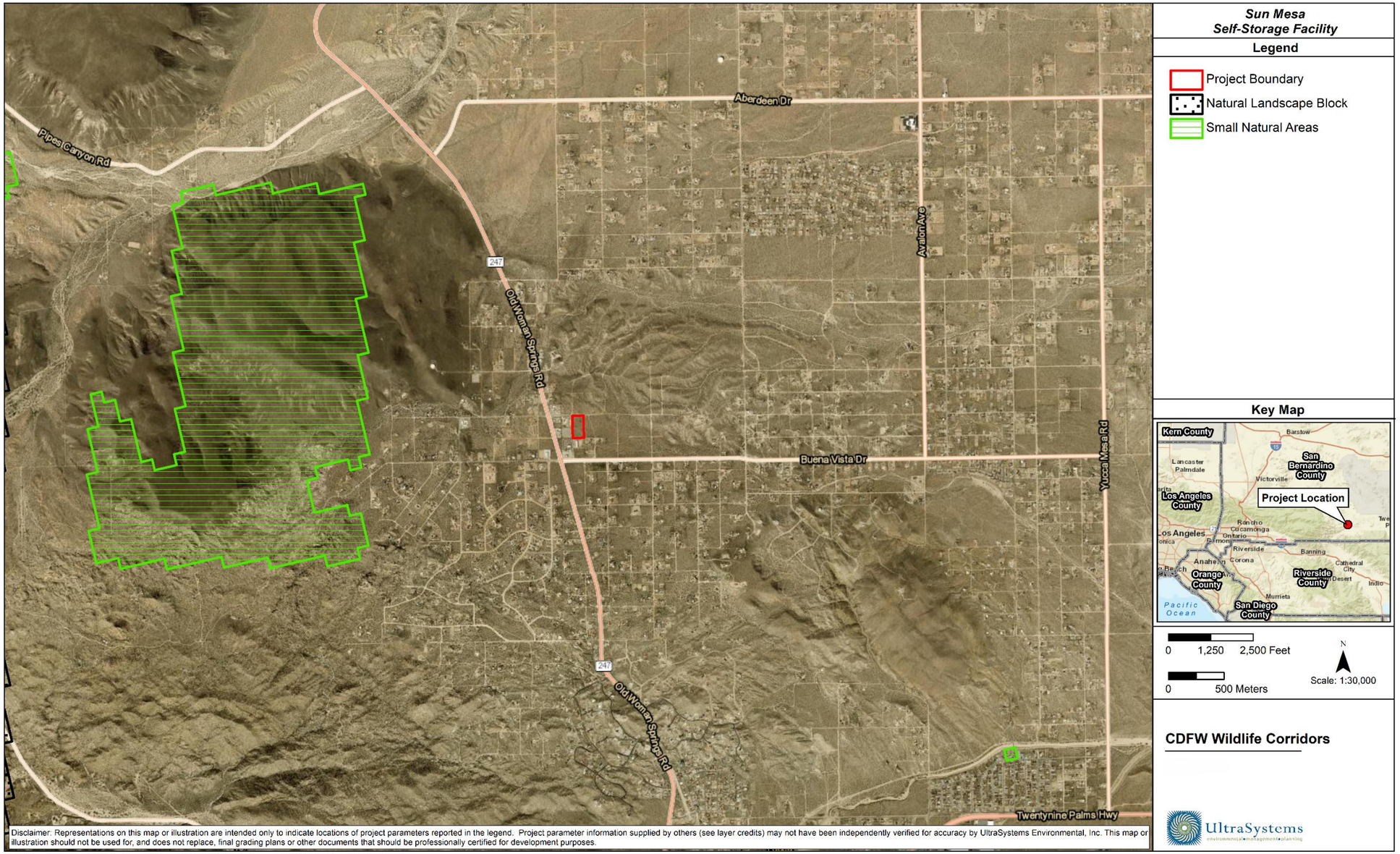
Protective fencing shall be installed around the perimeter of ecologically sensitive areas, which will be designated as No Work Areas, including around the perimeter of western Joshua trees scheduled to be transplanted, and native vegetation communities adjacent to work areas, before commencement of staging, fencing, clearing, grading, or other construction activities. The installation of fencing and protection measures around trees and vegetation will comply with the Town's Native Desert Vegetation Ordinance. The tree protection zone for Joshua tree is a 40-foot radius around the trunk of the tree. Fencing shall be maintained in place during all construction. No construction, grading, staging, or material storage will be allowed within the fence exclusion areas, or within the protected zones of any onsite native trees.

BIO-14: Yucca Valley Development Code Section 9.10.040

A native landscaping documentation package (report) shall be submitted to the division and at the time of filing land use applications (i.e., prior to any land disturbing or development activity) and may be combined with landscaping and water conservation requirements (Town of Yucca Valley, 2014). The report shall include a) the botanical and common names of regulated native desert plants, b) the precise location of each regulated desert native plant, c) the trunk or stem diameter of each regulated desert native plant, d) the height of each desert regulated native plant, e) the health or condition, including those unlikely to survive transplanting, of all regulated desert native plants, and f) the proposed placement of the regulated desert plant (i.e., the transplant site, removal determination, or adopt offsite).

Should a plant be determined as likely to survive transplanting by a qualified biologist, it shall be made available for adoption or transplanted onsite as part of the project's landscaping plan, which should maximize the use of native desert plants. The project applicant shall provide a thirty-day notice followed by a thirty-day adoption period; the adoption period may be less than thirty days should all plants be adopted. Adoption shall be prioritized in the Town of Yucca Valley, with second priority to the Morongo Basin. It is recommended the thirty-day adoption signage period commences with the submittal of the desert native plant permit. Signage posting will follow the requirements found in § 9.10.040E. All regulated desert native plants within the adoption program shall a) receive written permission to be obtained by the property owner, b) have consideration of plant's original and transplanted physical orientation, prevailing wind direction, soil type of the original and transplanted locations, and other related attributes which may affect the successful transplantation, and c) have a maintenance plan considering watering schedules, stockpile location, support, and the method of trap fencing. Plants which are not adopted within the thirty-day period may be removed.

Figure 4.4-8
CDFW WILDLIFE CORRIDORS



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\BIO\7335_SunMesa_4_4_Wildlife_Corridors_2025_07_25.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; CDFW, 2020; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Level of Significance After Mitigation

With implementation of measure **BIO-13**, conflicts with local policies or ordinances would be considered less than significant.

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

No Impact

The literature review determined that the project site is not located within an HCP or NCCP. Biological Resources

4.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?				**X**
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		**X**		
c) Disturb any human remains, including those interred outside of formal cemeteries?		**X**		

Information from the LSA *Cultural Resources Assessment Report*, *dated August 2025* (LSA, 2025e) (see **Appendix D**), *prepared for the Sun Mesa Mini Storage Project, Town of Yucca Valley* has been included within this section. (see **Figure 4.5-1,** *Topographic Map*)

4.5.1 Impact Analysis

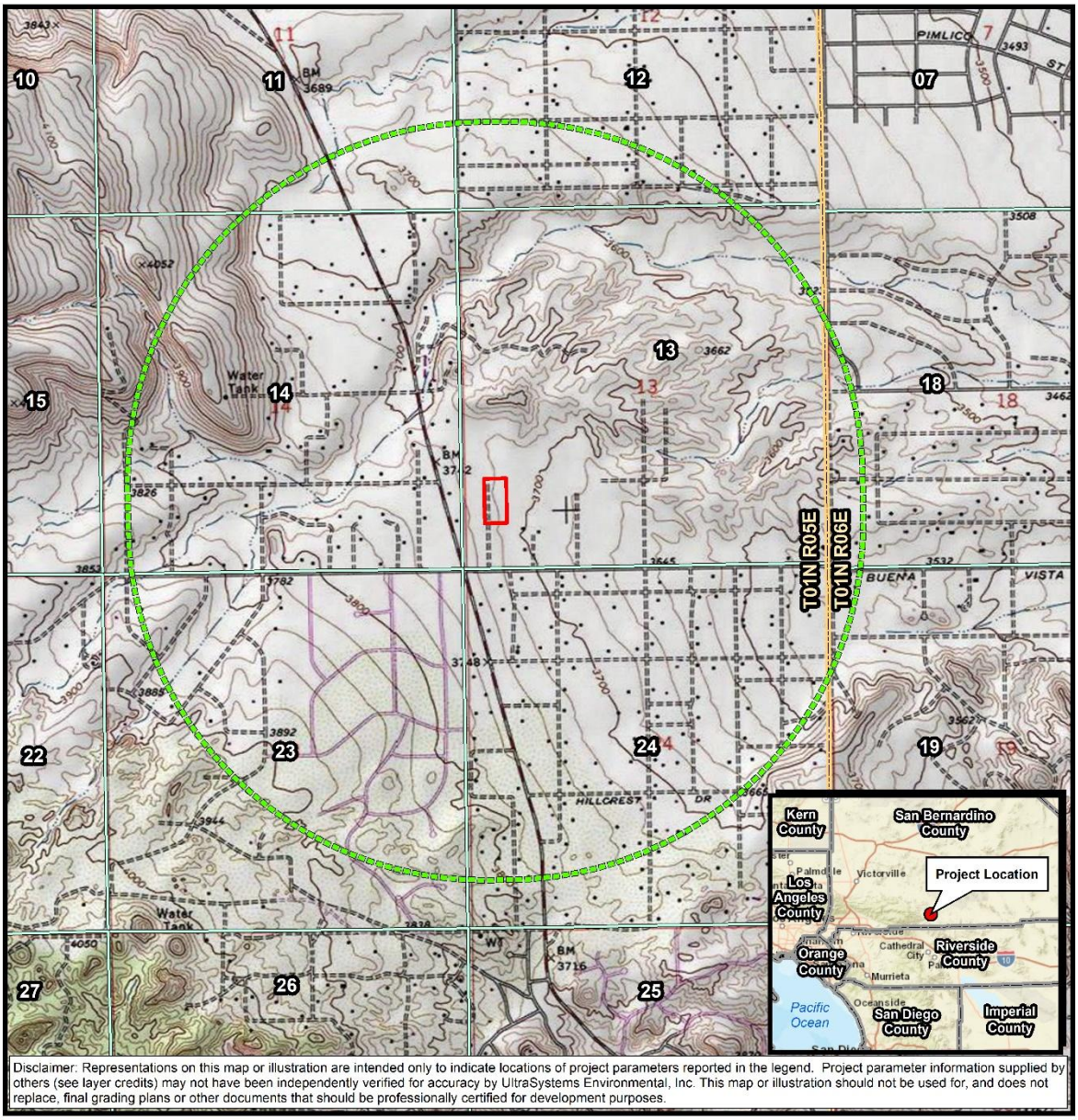
a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

<u>No Impact</u>

A historical resource is defined in § 15064.5(a)(3) of the *CEQA Guidelines* as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered as historical resources under CEQA.

Similarly, the National Register criteria (contained in Code of Federal Regulations Title 36 Section 60.4) are used to evaluate resources when complying with Section 106 of the National Historic Preservation Act. Specifically, the National Register criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that (a) are associated with events that have made a significant contribution to the broad patterns of our history; or (b) that are associated with the lives of persons significant in our past; or (c) that embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (d) that have yielded or may be likely to yield, information important to history or prehistory.

Figure 4.5-1
TOPOGRAPHIC MAP



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_5_Topo_2025_09_15.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Copyright:© 2013 National Geographic Society, i-cubed California Department of Conservation, 2019; CALAtlas, 2022; UltraSystems Environmental, Inc., 2025.

September 15, 2025

Scale: 1:24,000

N

0 625 1,250 Feet

0 250 500 Meters

Legend

- Project Boundary
- 1-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Sun Mesa Self-Storage Facility
Topographic Map
Quadrangle: Yucca Valley North
Township: 1N Range: 5E
Section:13

UltraSystems environmental•management•planning

A substantial adverse change in the significance of an historical resource, as a result of a project or development, is considered a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property, such that the significance of a historical resource would be materially impaired.

The cultural resources records search conducted at the South Central Coastal Information Center (SCCIC) at California State University Fullerton determined that no historic-era resources have been recorded at the project site. Within the one-mile radius of the project boundary (the area of Potential Impact, or APE), two historic resources were recorded, one being a 1950s residence at 4451 Old Woman Springs Road (36-027695) and the second a segment of Old Woman Springs Road (36-010716), a route dating to the 19th century. This historic period road (36-010716) is the nearest historic resource to the project site, approximately 160 meters/530 feet to the west of the project site.

According to records at the SCCIC, no previous cultural resource surveys have included a portion of the project site (APE), but there have been 16 surveys conducted within the one-mile radius project buffer that were not within the project APE (**Appendix D**).

No historic buildings were identified within the project site as a result of the project site's field survey.

No buildings or structures were present within the project area in historic period aerial photos or indicated on maps (NETR Online 2024).

Based on the results of the records search and the onsite field survey. there would be no substantial adverse change in the significance of a historical resource pursuant to in § 15064.5, and therefore the project would have no impact in this regard.

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

<u>Less than Significant Impact with Mitigation Incorporated</u>

An archaeological resource is defined in § 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in § 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in § 21083.2 of the Public Resources Code as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically-recognized important prehistoric or historic event or person.

The cultural resources investigation conducted by LSA, which included a CHRIS records search of the project site and buffer zone, and the pedestrian field survey suggest that a potential for undisturbed unique archeological resources exists on the project site due to the natural state of the project area. A search of the Sacred Lands File was not conducted by the Native American Heritage Commission for this project.

Based on the SCCIC cultural resources records search, it was determined that there are no prehistoric or historic cultural resources previously recorded within the project site boundary. Within the one-mile buffer zone, there have been three recorded resources, one of them prehistoric and two historic-era.

The single prehistoric site within the one-mile buffer of the project boundary is a lithic artifact scatter (36-002379). This artifact scatter is located approximately 0.29 mile southwest of the project site.

The two historic period resources include a 1950s residence at 4451 Old Woman Springs Road (36-027695) and a segment of Old Woman Springs Road (36-010716), a route dating to the 19th century that is located approximately 160 meters/530 feet to the west.

There have been 16 previous cultural resource studies within the one-mile buffer of the project. None of these surveys intersects the current project boundary.

A request was not made by LSA to the Native American Heritage Commission (NAHC) to conduct a search of their Sacred Lands File (SLF) for potential traditional cultural properties. LSA was not scoped to conduct the NAHC Sacred Lands File contact, and no such effort was made by LSA. However, UltraSystems contacted the NHAC on September 10, 2025 to request a SLF as well as a list of local Native American tribal organizations to contact. The NAHC SLF response was received September 11, 2025 and indicated that there are no SLF sites within the project area.

The NAHC provided 20 representatives of nine Native American tribes that are traditionally and culturally affiliated with the project's geographic area. The tribes listed below were contacted through email and USPS mail on September 17, 2025 requesting a reply if they have knowledge of cultural resources in the area that they wished to share and were also asked if they had any questions or concerns regarding the project. These tribes included:

- Agua Caliente Band of Cahuilla Indians
- Cahuilla Band of Indians
- Morongo Band of Mission Indians
- Quechan Tribe of the Fort Yuma Reservation
- Santa Rosa Band of Mission Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseño Indians
- Twenty-Nine Palms Band of Mission Indians
- Yuhaaviatam of San Manuel Nation

UltraSystems is in the process of conducting follow-up telephone calls to the respective tribes, and as part of the CEQA process, all responses will be included in the Final IS/MND once they are received.

A pedestrian field survey of the project site was conducted on July 20, 2024, by LSA Archaeologist Cassidy Sharp. The field survey revealed that there was light disturbance in the area from foot and bicycle traffic. Overall visibility was poor, at approximately 50 percent with the surface substantially obscured by vegetation. Access was not inhibited by vegetation. Soils are sandy alluvial silt. Trace historic period isolated rusted cans were noted. Concrete debris were noted, along with modern refuse throughout the project area. No cultural resources were identified.

Through the various avenues of research by LSA with a CHRIS records and a pedestrian field survey and by UltraSystems with a NAHC SLF search this study did not identify cultural resources within or adjacent to the project. However, a prehistoric lithic artifact scatter was documented less than 0.33 miles away, and approximately half of the project area surface was not visible. As a result, it is reasonable to assume that the project parcel retains some potential for in situ subsurface cultural

resources, and therefore, archaeological monitoring may be considered. Grading activities would cause new subsurface disturbance and may result in the unanticipated discovery of prehistoric and/or historic archeological resources.

Mitigation Measure

MM CUL-1 If archaeological resources are discovered during construction activities, the contractor will halt construction activities in the immediate area and notify the Town of Yucca Valley (California Code of Regulations, Title 14, Chapter 3, Section 15064.5(f)). The project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology who will be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist will recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-L) form and filed with the South Central Coastal Information Center. Construction activities may continue on other parts of the project site while evaluation and treatment of prehistoric archaeological resources takes place.

Level of Significance After Mitigation

With implementation of Mitigation Measure **MM CUL-1** above, the project would result in less than significant impacts to archeological resources.

e) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact with Mitigation Incorporated

As previously discussed in **Section 4.5.b)** above**,** the project would be built on relatively undisturbed land that has not been previously graded and is in a suburban area. No human remains have been previously identified or recorded onsite.

The proposed project includes grading activities for the installation of infrastructure including water, wastewater, and utility lines; and for construction of the proposed buildings. Grading would involve new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries. In the unlikely event of an unexpected discovery, implementation of mitigation measure **CUL-2** would ensure that impacts related to the accidental discovery of human remains would be less than significant.

Mitigation Measure

MM CUL-2 If human remains are encountered during excavations associated with this project, all work will stop within a 30-foot radius of the discovery and the San Bernardino County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLD (either an individual or sometimes a committee) will be responsible for the ultimate

disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).

Level of Significance After Mitigation

With adherence to applicable codes and regulations protecting cultural resources and with implementation of Mitigation Measure **MM CUL-2** above, the proposed project would result in less than significant impacts to human remains.

4.6 Energy

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

The following analysis is based substantially on a memorandum prepared by LSA on September 13, 2025: *Air Quality, Energy, and Greenhouse Gas Technical Memorandum for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California* (LSA, 2025a).

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

<u>Less than Significant Impact</u>

According to CEQA Guidelines § 15126.2(d), "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Construction

The anticipated construction schedule assumes that the proposed project will be built in six to eight months. Construction-specific phases were assessed for their energy consumption under each construction sub-phase: grading, site preparation, building construction, paving, architectural coating, and trenching activities.

Construction would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the building. All or most of this energy would be derived from nonrenewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. However, construction activities are not expected to result in inefficient use of energy, as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to

minimize their costs on the project. Energy (i.e., fuel) usage on the project site during construction would be temporary and would be relatively small in comparison to the state's available energy sources.

Operation

Table 4.6-1 shows the estimated potential increase in electricity, gasoline, and diesel demand associated with the proposed project, which was calculated by LSA (LSA, 2025a). The electricity and natural gas rates are from the CalEEMod analysis.[8] while the gasoline and diesel rates are based on the traffic analysis in conjunction with USDOT fuel efficiency data, and using the USEPA's fuel economy estimates for 2020, and the California diesel fuel economy estimates for 2021.

Table 4.6-1
ESTIMATED PROJECT OPERATIONAL ENERGY USE

	Electricity Use (kWh per year)	Natural Gas Use (kBTU per year)	Gasoline (gallons per year)	Diesel (gallons per year)
Proposed Project	962,994	0	27,218	19,120

Source: Compiled by LSA (LSA, 2025a).
kBTU = thousand British thermal units
kWh = kilowatt hours

As shown in **Table 4.6-**1, the estimated increase in electricity demand associated with the operation of the proposed project would be 962,994 kWh per year. Total electricity consumption in San Bernardino County in 2022 was 16,629,614,195 kWh;[9] therefore, operation of the proposed project would negligibly increase the annual electricity consumption in San Bernardino County (by less than 0.1 percent).

In addition, the project would result in energy usage associated with motor vehicle gasoline to fuel project-related trips. As shown above in **Table 4.6-1**, the proposed project would result in the consumption of 27,218 gallons of gasoline and 19,120 gallons of diesel per year. Based on fuel consumption obtained from EMFAC2021[10], approximately 328.0 million gallons of gasoline and approximately 856.3 million gallons of diesel will be consumed from vehicle trips in San Bernardino County in 2026. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in San Bernardino County by approximately less than 0.1 percent for gasoline fuel usage and approximately less than 0.1 percent for diesel fuel usage. The proposed project would result in fuel usage that is a negligible fraction of current annual fuel use in San Bernardino County, and fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, gasoline demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Furthermore, the proposed project would be constructed using energy-efficient modern building materials and construction practices. Additionally, the proposed project would utilize new, modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR

8 See **Section 4.8.2**.
9 CEC. 2022. Electricity Consumption by County. Website: www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed September 2024).
10 EMFAC2021 was used by LSA in preparation of their September 12, 2024 memorandum.

Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for commercial uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings. Therefore, the proposed project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

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

Less than Significant Impact

According to the LSA Memorandum (2025), the California Energy Commission (CEC) recently adopted the 2023 Integrated Energy Policy Report (IEPR) (LSA, 2025a). The 2023 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2023 IEPR covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecasts, and the California Energy Demand Forecast.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the state's available energy sources. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the region's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's 2023 IEPR. Therefore, the proposed project would not lead to new or substantially more severe energy impacts.

4.7 Geology and Soils

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

The information in this section is based on the following technical report:

- Geotechnical Investigation, Proposed Self-Storage Facility, APN 0597-111-67, SEC Sun Mesa Drive & Newton Lane Town Of Yucca Valley, California. Prepared by Sladden Engineering,

dated January 22, 2025 (Sladden, 2025a). A complete copy of this report is included as **Appendix E** to this IS/MND.

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

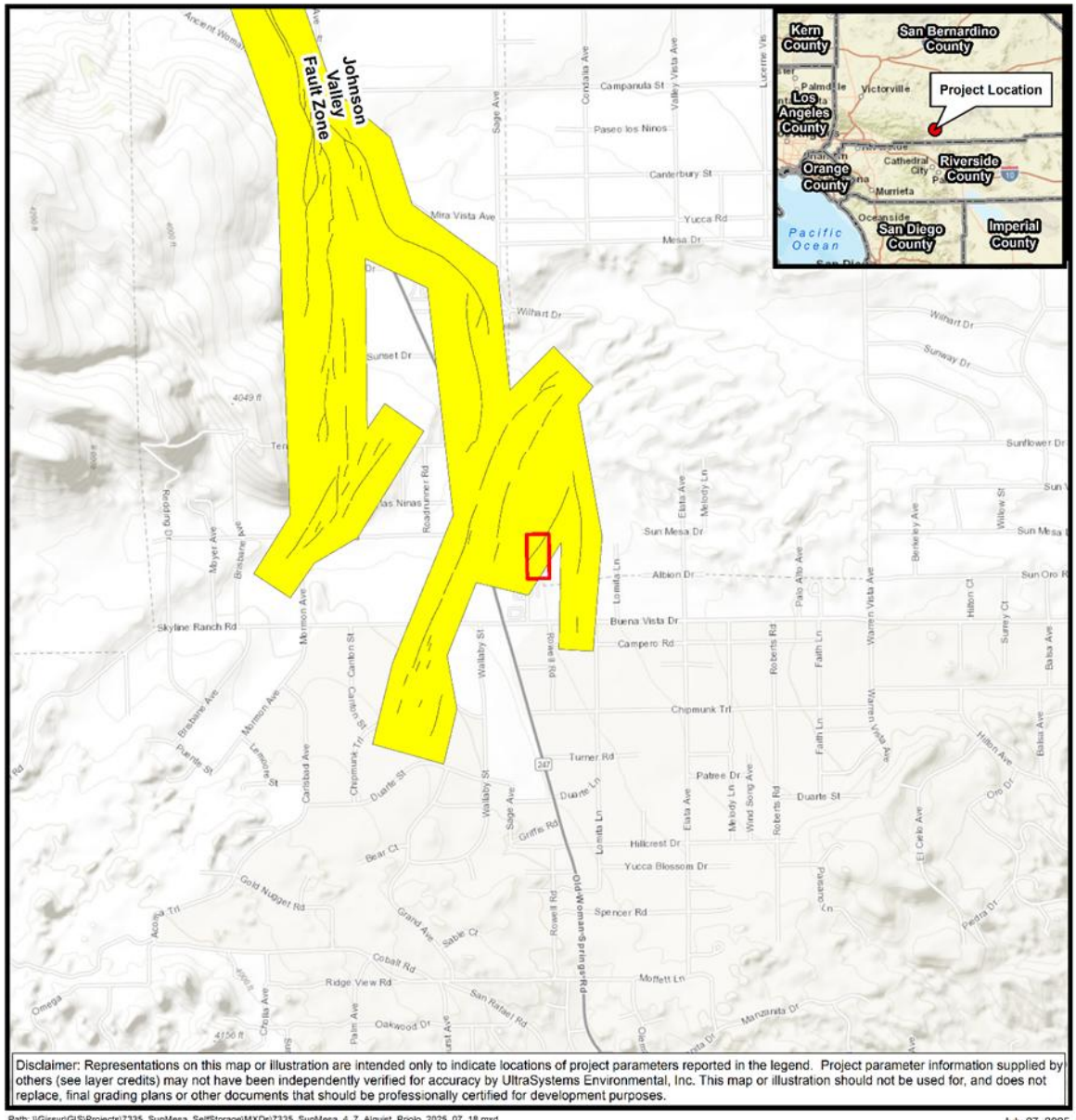
Less than Significant Impact

The Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. The act requires that cities and counties mandate that proponents of projects within Alquist-Priolo Earthquake Fault Zones have geologic investigations conducted to determine whether the sites are threatened by surface displacements from future faulting before cities or counties may issue development permits for such projects. Pursuant to this act, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. The project site is within an Alquist-Priolo Earthquake Fault Zone, as shown on **Figure 4.7-1**. A trace of the Johnson Valley Fault Zone passes within the project site, as shown on **Figure 4.7-2**. The project geotechnical investigation report includes the following text (Sladden, 2025a, p. 8):

> In accordance with current State of California guidelines, subsurface fault studies should be performed to identify the active surface rupture potential. Habitable structures are not permitted to be constructed across active fault splays. Local planning agencies are responsible for regulating and enforcing the applicable laws and ordinances regarding building and construction in accordance with state and local requirements. This includes oversight regarding the construction of structures not intended for human occupancy on parcels delineated to be within the fault zone. **Based on the nature of the project, it is our understanding the proposed self-storage units and office are not intended for human occupancy or to exceed 2,000 person-hours per year** (emphasis added).

The project applicant anticipates that one part-time employee would be present onsite (Billings, 2025). Self-storage customers are typically onsite only occasionally and any attempt to estimate the total durations of such visits annually would be speculative. Impacts arising from surface rupture of a known active fault would be less than significant, and impacts would be less than significant.

Figure 4.7-1
ALQUIST PRIOLO FAULT ZONES



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_7_Alquist_Priolo_2025_07_18.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Seismic Hazards Program, California Geological Survey, California Department of Conservation, Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, 2021; UltraSystems Environmental, Inc., 2025.

July 27, 2025

Scale: 1:24,000

N

0 1,000 2,000 Feet

0 0.25 0.5 Kilometers

Legend

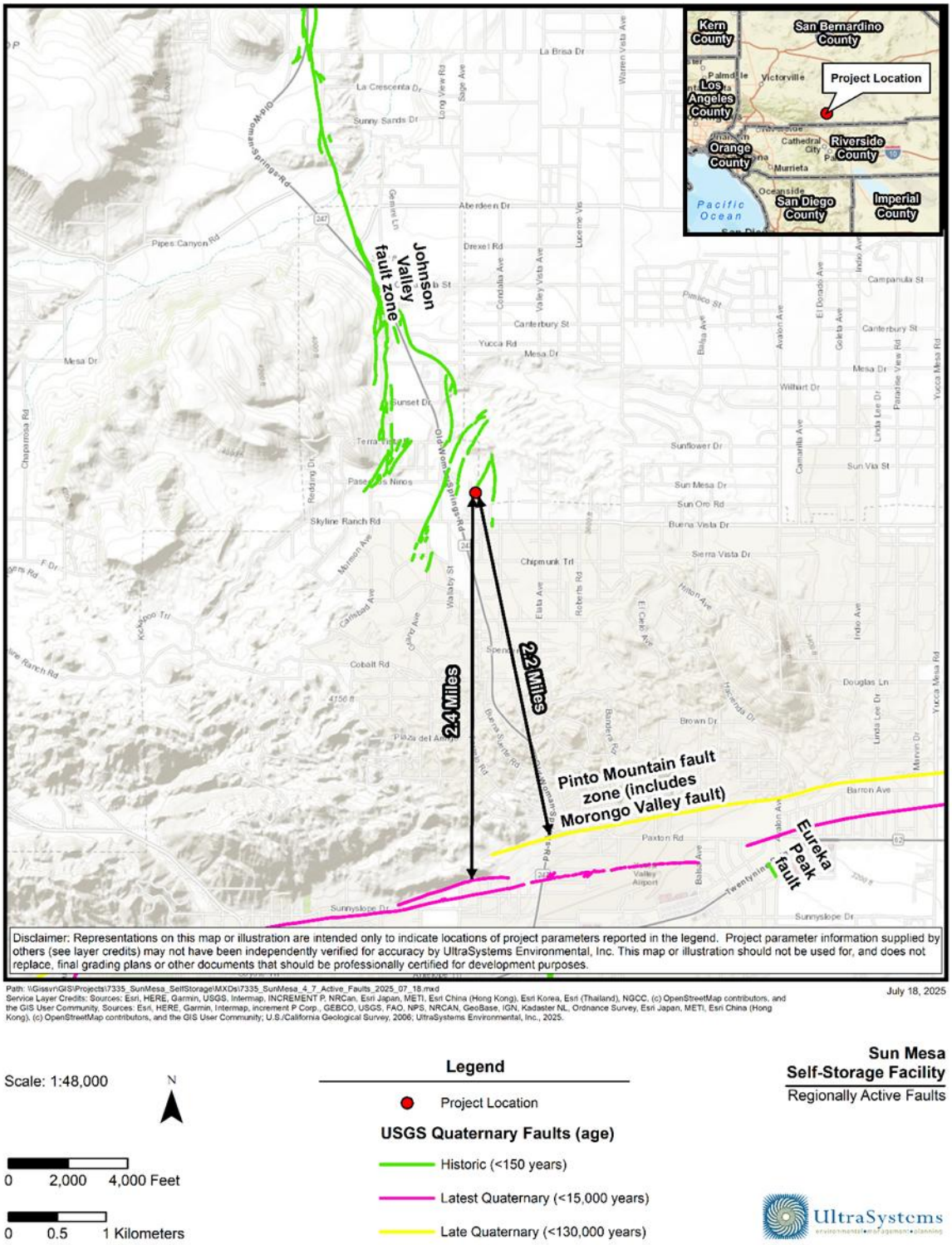
- Project Boundary
- Alquist Priolo Special Study Zone Boundary
- Alquist Priolo Potentially Active Fault

Sun Mesa Self-Storage Facility

Alquist Priolo Earthquake Fault Zones

UltraSystems environmental•management•planning

Figure 4.7-2
REGIONALLY ACTIVE FAULTS



ii) Strong seismic ground shaking?

Less than Significant Impact

As shown in **Figure 4.7-2**, the project is located within a seismically active region of Southern California, and all structures in the region are susceptible to collapse, buckling of walls, and damage to foundations from strong seismic ground shaking. A trace of the Johnson Valley Fault, which is active, passes through the project site. Several other fault traces are within one mile of the project site. One other active fault, the Pinto Mountain Fault Zone, is about 2.2 miles south of the project site.

The project would be constructed in accordance with the applicable 2025 California Building Code (CBC) issued by the California Building Standards Commission and used throughout the state (California Code of Regulations, Title 24).[11] In addition, the CBC is adopted as § 8.02.020 of the Town's Municipal Code and provides minimum standards to protect property and for public welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site.

Although the project site is susceptible to occasional moderate/high ground shaking from active faults in and near the project site, design and construction in accordance with the CBC would address issues related to potential seismic ground shaking at the site. For these reasons, impacts from strong seismic ground shaking would be less than significant and mitigation is not proposed.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact

General types of ground failures that might occur as a consequence of severe ground shaking typically include landslides, ground subsidence, ground lurching and shallow ground rupture. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from the faults, topography, subsoils and relatively shallow groundwater tables (approximately 50 feet or less below ground surface), in addition to other factors.

Liquefaction typically occurs when saturated or partially saturated soils behave like a liquid, as a result of losses in strength and stiffness in response to an applied stress caused by ground shaking or other sudden change in stress conditions.

The historic high groundwater levels in measured wells nearest the project site are 167 and 100 feet below ground surface, respectively (Sladden, 2025a, p. 5). The potential for liquefaction in subsurface site sediments is considered low due to the lack of shallow groundwater (Sladden, 2025a, p. 8).

Compliance with federal, state, and local regulations, including the CBC and the Town's Municipal Code, would minimize hazards from potential seismic-related ground failure, including liquefaction, that could be exacerbated by project development. Impacts would be less than significant, and mitigation is not required.

[11] The 2025 CBC will take effect on January 1st 2026; the 2022 CBC is effective till then.

iv) Landslides?

<u>No Impact</u>

The project site is relatively flat, consisting of a southeast-facing slope of approximately two percent grade. Existing landslide risk onsite is considered negligible (Sladden, 2025a, p. 8), and project development would not exacerbate landslide risk. No impact would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact

Construction

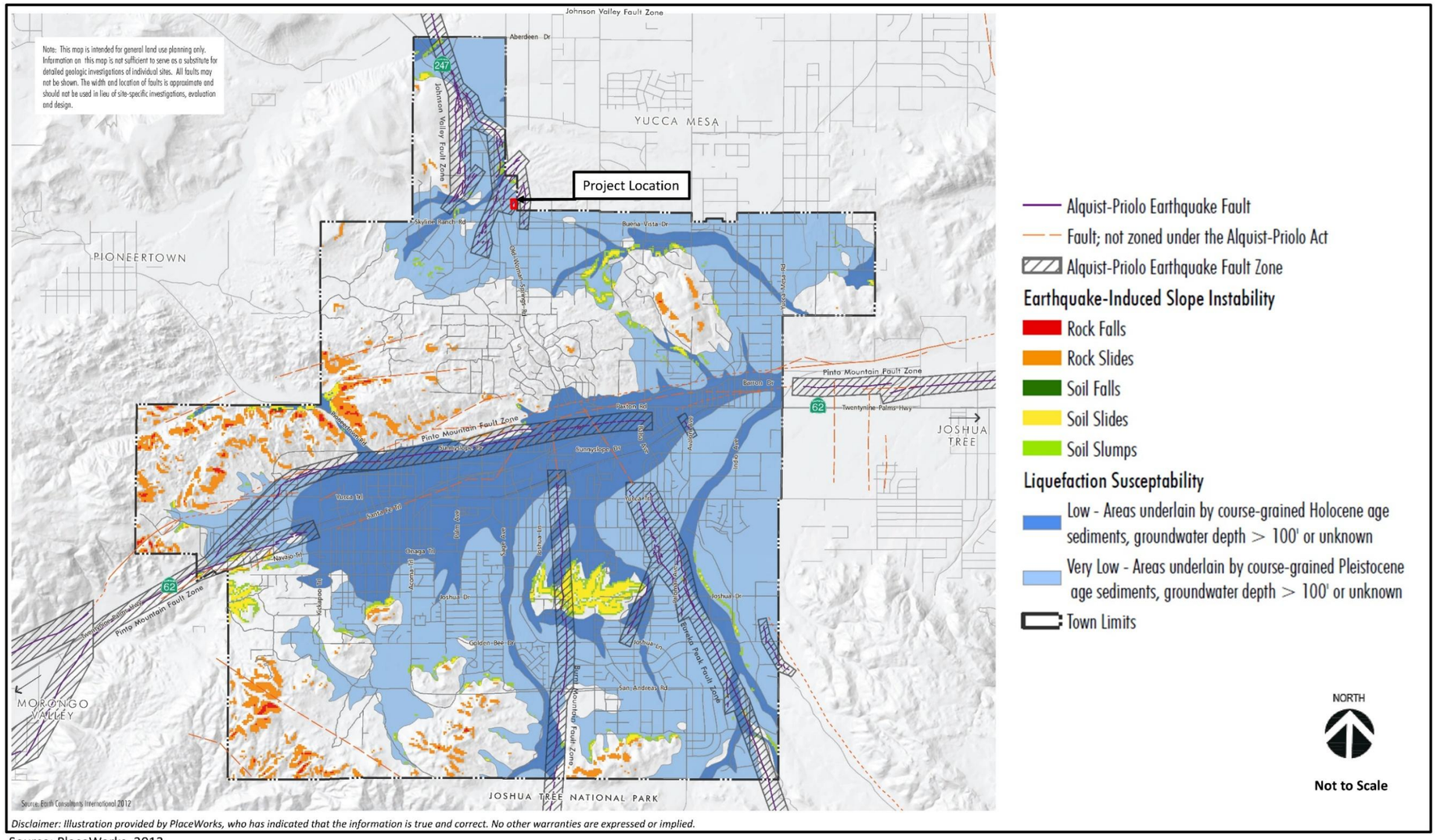
Project construction would involve extensive disturbance and exposure of soil, and thus could cause substantial soil erosion if effective soil erosion measures were not used. The Town of Yucca Valley Municipal Code, Chapter 9.37 requires that applicants for grading permits submit a soil erosion, sediment and dust control plan with their permit application; and the Director of Community Development must approve the soil erosion, sediment and dust control plan (Amlegal.com, 2025). Construction, grading, excavation, and land clearing operations are required to use measures to minimize wind erosion under MDAQMD Rule 403 (MDAQMD, 2020c). Grading and construction activities pursuant to the General Plan Update would comply with existing laws and regulations aimed at minimizing or eliminating pollution of stormwater with trash and debris and pollution of air and water by dust (Town of Yucca Valley, 2014, p. 5.8-24). Construction water quality impacts would be less than significant after compliance with the above-specified municipal code chapter and regulations.

Note that while construction projects one acre or larger in much of California must obtain coverage under the Statewide General Construction Permit (SGCP) issued by the State Water Resources Control Board, the SGCP only applies to areas where receiving waters are Waters of the United States (WOUS). Surface waters in Yucca Valley are not WOUS, and thus the SGCP does not apply to construction projects in Yucca Valley.

Operational Pollutant Controls

The project would be developed with a mix of impervious surfaces such as concrete and pavement and landscaped areas, including landscaping along the site boundary. The project includes drainage improvements consisting of two concrete ribbon gutters (that is, shallow, v-shaped concrete gutters, typically in the medians of driveways or drive aisles) extending north-south: one through the middle of the site, and one near the east site boundary; and an infiltration basin in the southwest corner of the site. The design capture volume of the infiltration basin is 13,243 cubic feet (DRP, 2024b, p. 17). Infiltration basins are highly effective at removing sediment (CASQA, 2003, p. TC-11-1). The project would have less than significant impacts related to soil erosion or loss of topsoil and mitigation is not proposed.

Figure 4.7-3
LANDSLIDES AND LIQUEFACTION



Disclaimer: Illustration provided by PlaceWorks, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: PlaceWorks, 2013.

Sun Mesa Self-Storage Facility

Landslide and Liquefaction Zones

UltraSystems
environmental•management•planning

c) Would the project 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 Impact

Sediments underlying the site, to the maximum depth of 21.5 feet below ground surface explored during the geotechnical investigation, are native alluvium consisting of granular soil that is dry and medium dense (Sladden, 2025a, p. 4).

Impacts related to liquefaction and landslides are discussed above in **Section 4.7 a)**. Furthermore, as described in previous responses, the site possesses low probability of landslides and liquefaction. Additionally, the project would be constructed in accordance with the requirements of the Town of Yucca Valley Municipal Code Section 8.02.020 (Building Code) and the Occupational Safety and Health Administration, which are designed to assure safe construction and include building foundation requirements appropriate to site-specific conditions.

Lateral Spreading

Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. The potential for lateral spreading onsite is considered low due to the low potential for liquefaction in subsurface site sediments (Sladden, 2025a). Impacts would be less than significant.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or being subject to a load. Collapse typically occurs in young, unconsolidated, low-density, loose, dry soils common in arid to semi-arid regions. Collapsible soils are usually composed of granular particles cemented together by clay bonds. When such soils become saturated the clay bonds dissolve, causing substantial shrinkage (NRCS, 2004, p. 60). The geotechnical investigation determined that existing soils within two feet of the ground surface are unsuitable for supporting the proposed structures, and recommends over-excavation and re-compaction to a depth of two feet below existing grade or two feet below the bottoms of proposed footings, whichever is deeper (Sladden, 2025a, p. 10). Project site grading and project design and construction would comply with the preceding recommendations of the Geotechnical Evaluation Report, and project development would not exacerbate hazards arising from collapsible soils. Impacts would be less than significant.

Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. The project site is not in an area of subsidence mapped by the USGS (USGS, 2025). Groundwater extraction from the Warren and Ames groundwater basins is managed pursuant to a court judgment (Warren basin) and settlement agreement (Ames Basin) (HDWD, 2021, pp. 3-4 and 3-12); thus, substantial ground subsidence in HDWD's service area is not anticipated. Project development would not exacerbate hazards related to ground subsidence. Impacts would be less than significant.

d) Would the project 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

Expansive soils shrink and swell with changes in soil moisture. Soil moisture may change from landscape irrigation, rainfall, and utility leakage. A measurement of expansion index in one subsurface soil sample conducted as part of the geotechnical evaluation yielded an expansion index of 1, indicating low expansion potential (Sladden, 2025a, p. 8). Impacts arising from expansive soils would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Less than Significant Impact

A septic system including a septic tank and leach lines are proposed for wastewater disposal. The percolation testing report for the proposed project determined that leach lines may be used for sewage disposal on the site (Sladden, 2025b, p. 5). The percolation testing report is included as **Appendix G1**. Impacts related to capability of soils to support septic tanks would be less than significant.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated

The project site is mapped as having moderate paleontological resource sensitivity in the Town of Yucca Valley General Plan (Yucca Valley, 2014, p. 5-35). The project site is underlain by Quaternary-aged older alluvium consisting of poorly bedded to non-bedded cobble-gravel and sand; and Quaternary-aged older gravel consisting of poorly-bedded cobble gravel and coarse sand (Sladden, 2025a, p.3; Dibblee and Minch, 2008). The Quaternary Period extends from approximately 2.58 million years before present to the present (ICS, 2024). Soils and sediment found onsite during the geotechnical investigation, to the maximum depth explored of 21.5 feet below ground surface (bgs), are alluvium consisting of granular soil that is dry, medium dense, and grayish brown (Sladden, 2025a, p. 4).

Two vertebrate fossils, one of an extinct horse and the other a desert tortoise, are known within the west-central portion of Town. Additional fossils are known regionally and include extinct animals such as mammoth, ground sloths, camel, horse, llama, dwarf pronghorn, and saber-toothed cat. Other regional fossils produced by older sediment and bedrock include extinct animals such as a zebra-like horse and Furlong's rabbit in addition to cotton rat, wood rat, and brown bat (Town of Yucca Valley, 2014, pp. 5-31 to -32).

Excavations or grading that extend into the uppermost layers of soil and deeper excavation into the older Quaternary sediments in the proposed project area may encounter fossils. Any substantial excavations below the uppermost layers should be closely monitored to quickly and professionally collect any specimens. Mitigation measure GEO-1 is required.

Mitigation Measure

MM GEO-1 Prior to the issuance of the grading permit, the applicant shall provide a letter to the Town of Yucca Valley Planning Division, or designee, from a qualified paleontologist stating that the paleontologist has been retained to provide services for the project. The paleontologist shall develop, as needed, a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite for the review and approval by the City. The PRIMP shall require that the paleontologist perform periodic paleontological monitoring of any ground disturbing activities within undisturbed native sediments during mass grading, site preparation, and underground utility installation. The project paleontologist may reevaluate the necessity for paleontological monitoring after 50 percent or greater of the excavations have been completed. In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. Criteria for discarding specific fossil specimens shall be made explicit. If the qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if a significant fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository such as the San Bernardino County Museum. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

Level of Significance After Mitigation

With implementation of **MM GEO-1**, potential impacts to paleontological resources would be reduced to a less than significant level.

4.8 Greenhouse Gas Emissions

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

4.8.1 Introduction

The following analysis of the proposed project's greenhouse gas (GHG) emissions is based substantially on a memorandum prepared by LSA on September 13, 2025: *Air Quality, Energy, and Greenhouse Gas Technical Memorandum for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California* (LSA, 2025a). Attachment B to the memorandum includes results of the model that LSA used to estimate the proposed project's air quality and GHG emissions.[12]

4.8.2 Background Information on Greenhouse Gas Emissions

Life on Earth depends on energy coming from the sun. About half the light reaching Earth's atmosphere passes through the air and clouds to the surface, where it is absorbed and then radiated upward in the form of infrared heat. About 90 percent of this heat is then absorbed by carbon dioxide (CO_2) and other greenhouse gases (GHGs) and radiated back toward the surface, which is warmed to a life supporting average of 59 degrees Fahrenheit (°F) (NASA, 2024).

Human activities are changing the natural greenhouse. Over the last century, the burning of fossil fuels such as coal and oil has increased the concentration of atmospheric CO_2. This happens because the coal or oil burning process combines carbon in the fuel with oxygen in the air to make CO_2. To a lesser extent, the clearing of land for agriculture, industry, and other human activities has increased concentrations of GHGs (NASA, 2024).

GHGs are defined under the California Global Warming Solutions Act of 2006 as CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF_6). HFCs, PFCs, and SF_6 would not be emitted in significant amounts by the new activities in the proposed project, so they will not be discussed further.

Associated with each GHG species is a "global warming potential" (GWP), which is a value used to compare the abilities of different GHGs to trap heat in the atmosphere. GWPs are based on the heat absorbing ability of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years). The GWPs of CO_2, CH_4 and N_2O are 1,

[12] See **Section 4.8.6**.

25 and 298, respectively (GMI, 2019). Carbon dioxide equivalent (CO_2e) emissions are calculated by weighting each GHG compound's emissions by its GWP and then summing the products.

Carbon Dioxide (CO_2). Carbon dioxide is a colorless, odorless gas consisting of molecules made up of two oxygen atoms and one carbon atom. CO_2 is produced when an organic carbon compound (such as wood) or fossilized organic matter (such as coal, oil, or natural gas) is burned in the presence of oxygen. Since the industrial revolution began in the mid-1700s, industrial activities have increased in scale and distribution. Prior to the industrial revolution, CO_2 concentrations were stable at a range of 275 to 285 parts per million (ppm) (IPCC, 2007a). The National Oceanic and Atmospheric Administration's Earth System Research Laboratory indicates that the global concentration of CO_2 was 426.89 ppm in May 2025 (NOAA, 2025). These concentrations of CO_2 exceed by far the natural range over the last 650,000 years (180 to 300 ppm) as determined from ice cores.

Methane (CH_4). Methane is a colorless, odorless non-toxic gas consisting of molecules made up of four hydrogen atoms and one carbon atom. CH_4 is combustible, and is the main constituent of natural gas, a fossil fuel. CH_4 is released when organic matter decomposes in low oxygen environments. Natural sources include wetlands, swamps and marshes, termites, and oceans. Anthropogenic sources include the mining of fossil fuels and transportation of natural gas, digestive processes in ruminant animals such as cattle, rice paddies, and the buried waste in landfills. Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Nitrous Oxide (N_2O). Nitrous oxide is a colorless, non-flammable gas with a sweetish odor, commonly known as "laughing gas," and sometimes used as an anesthetic. N_2O is naturally produced in the oceans and in rainforests (USEPA, 2025f). Manmade sources of N_2O include the use of fertilizers in agriculture, nylon and nitric acid production, cars with catalytic converters and the burning of organic matter. Concentrations of N_2O also began to rise at the beginning of the industrial revolution.

4.8.3 Regulatory Setting

GHGs are regulated at the national, state, and air basin level; each agency has a different degree of control. The United States Environmental Protection Agency (USEPA) regulates at the national level; the California Air Resources Board (ARB) regulates at the state level; and the Mojave Desert Air Quality Management District (MDAQMD) regulates at the air basin level in the project area.

4.8.3.1 Federal Regulations

The USEPA collects several types of GHG emissions data. These data help policy makers, businesses, and the USEPA track GHG emissions trends and identify opportunities for reducing emissions and increasing efficiency. The USEPA has been maintaining a national inventory of GHG emissions since 1990 and in 2009 established mandatory reporting of GHG emissions from large GHG emissions sources.

EPA is also getting GHG reductions through partnerships and initiatives; evaluating policy options, costs, and benefits; advancing the science; partnering internationally and with states, localities, and tribes; and helping communities adapt.

4.8.3.2 Corporate Average Fuel Economy (CAFE) Standards

The National Highway Traffic Safety Administration's (NHTSA's) Corporate Average Fuel Economy (CAFE) standards regulate the distance vehicles must cover per gallon of fuel. The agency establishes CAFE standards for passenger cars and light trucks (referred to as light-duty vehicles), as well as separate guidelines for fuel consumption by medium- and heavy-duty trucks and engines. The CAFE standards that became effective August 23, 2024 increased fuel efficiency for passenger cars by 2 percent annually for model years 2027–31. Light trucks were increased by 2 percent annually for model years 2029–31. Additionally, NHTSA is setting final fuel efficiency standards for heavy-duty pickup trucks and vans (HDPUVs) with a 10 percent annual increase for model years 2030–32 and further increases for model years 2033–35. However, the One Big Beautiful Bill Act, signed into law on July 4, 2025, removed civil penalties for failing to comply with federal fuel economy standards.

4.8.3.3 State Regulations

Executive Order S 3-05

On June 1, 2005, the governor issued EO S 3-05, which set the following GHG emission reduction targets:

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

To meet these targets, the Climate Action Team (CAT)[13] prepared a report to the Governor in 2006 that contained recommendations and strategies to help ensure that the targets in EO S-3-05 are met.

Assembly Bill 32 (AB 32)

In 2006, the California State Legislature enacted the California Global Warming Solutions Act of 2006, also known as AB 32. AB 32 focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. AB 32 required that GHGs emitted in California be reduced to 1990 levels by the year 2020. The ARB is the state agency charged with monitoring and regulating sources of emissions of GHGs that cause global warming. AB 32 also required that by January 1, 2008, the ARB determine what the statewide GHG emissions level was in 1990, and it must approve a statewide GHG emissions limit, so it may be applied to the 2020 benchmark. The ARB approved a 1990 GHG emissions level of 427 million metric tons of CO_2e ($MMTCO_2e$), on December 6, 2007, in its Staff Report. Therefore, emissions in California were required to be at or below 427 $MMTCO_2e$ by 2020.

Under the "business as usual" or BAU scenario established in 2008, statewide emissions were increasing at a rate of approximately one percent per year as noted below. It was estimated that the 2020 estimated BAU of 596 $MMTCO_2e$ would have required a 28 percent reduction to reach the 1990 level of 427 $MMTCO_2e$.

[13] The Climate Action Team (CAT) members are state agency secretaries and the heads of agencies, boards, and departments, led by the Secretary of the California Environmental Protection Agency (Cal/EPA). They coordinate statewide efforts to implement global warming emission reduction programs and the state's Climate Adaptation Strategy.

As part of the 2014 update to the AB 32 Scoping Plan (see below), the ARB revised the 2020 Statewide limit to 431 million MT of CO_2e, an approximately one percent increase from the original estimate. The 2020 business-as-usual forecast in the update is 509 $MMTCO_2e$. The state would need to reduce those emissions by 15.3 percent to meet the 431 $MMTCO_2e$ 2020 limit.

Climate Change Scoping Plan

The first AB 32 Scoping Plan (ARB, 2008) contained the main strategies to achieve the 2020 emissions cap. The strategies included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

In December 2022, the ARB approved its Final 2022 Scoping Plan Update (ARB, 2022), which adds carbon neutrality to the former Scoping Plan. The 2022 Plan identifies a technologically feasible, cost-effective path to reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 or earlier. Through the lens of carbon neutrality, the 2022 Plan expands the scope to more meaningfully consider how our natural and working lands (NWL) contribute to our long-term climate goal through carbon capture. The 2022 Plan focuses on efforts to shift away from fossil fuels, resulting in a 94 percent decrease in liquid petroleum demand, a 71 percent decrease in smog-related pollutants, a job increase of 4 million, and $200 billion of health cost savings for Californians (ARB, 2022).

Renewables Portfolio Standard (Scoping Action E-3)

The California Energy Commission estimates that in 2000 about 12 percent of California's retail electric load was met with renewable resources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. California's current Renewables Portfolio Standard (RPS) was intended to increase that share to 33 percent by 2020. It was reported that in 2021, over 37 percent of California's retail electricity sales were provided by RPS-certified renewables (CEC, 2023). Increased use of renewables will decrease California's reliance on fossil fuels, thus reducing emissions of GHGs from the electricity sector. In October 2015, Governor Brown signed into law Senate Bill (SB) 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 requires an increase in the RPS to 60 percent by 2030, along with a long-term goal of 100 percent of RPS and zero-carbon energy by 2045 (CEC, 2023).

Senate Bill 375 (SB 375)

Senate Bill (SB) 375 passed the Senate on August 30, 2008, and was signed by the governor on September 30, 2008. Per SB 375, the transportation sector is the largest contributor of GHG emissions and contributes approximately 45 percent of the GHG emissions in California, with automobiles and light trucks alone contributing almost 30 percent. SB 375 indicates that GHGs from automobiles and light trucks can be reduced by new vehicle technology. However, significant reductions from changed land use patterns and improved transportation also are necessary. SB 375 states, "Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." SB 375 (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

Executive Order B-30-15

On April 29, 2015, the governor issued EO B-30-15, which added an interim target of GHG emissions reductions to help ensure the State meets its 80-percent reduction by 2050, as set in EO S-3-05. The interim target is to reduce GHG emissions by 40 percent by 2030. It also directs state agencies to update the Scoping Plan, update an Adaptation Strategy every three years, and take climate change into account in their planning and investment strategies. Additionally, it requires the State's Five-Year Infrastructure Plan to take current and future climate change impacts into account in all infrastructure projects.

Title 24

Although not originally intended to reduce GHGs, California Code of Regulations Title 24 Part 6: California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods. The California Energy Commission updates the standards every three years. The 2025 standard, which will go into effect effective January 1, 2026, encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more (CEC, 2025).

4.8.3.4 Local Regulations

4.8.3.5 Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization (MPO) for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. Covering 191 cities over 38,000 square miles, SCAG operates as a Joint Powers Authority and serves as both the Regional Transportation Planning Agency and the Council of Governments under state law. SCAG is responsible for preparing long-range transportation planning documents, including the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2008 Regional Comprehensive Plan. On April 4, 2024, SCAG adopted Connect SoCal, the 2024–2050 RTP/SCS, which outlines a regional development pattern designed to reduce VMT from passenger vehicles and light-duty trucks. This, in turn, supports the reduction of GHG emissions from the transportation sector (SCAG, 2024).

The ARB has established GHG reduction targets for the SCAG region of eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 levels by 2035. The RTP/SCS includes strategies to help the region meet these targets through coordinated land use and transportation planning. Key land use strategies include promoting new development near high-quality transit areas, along livable corridors, and within neighborhood mobility areas to encourage active transportation and reduce reliance on personal vehicles.

Although the RTP/SCS provides a regional framework for reducing GHG emissions, it does not mandate consistency with local General Plans, Specific Plans, or zoning ordinances. Instead, SCAG offers incentives to jurisdictions and developers that align local planning efforts with the SCS strategies.

4.8.3.6 The Mojave Desert Air Quality Management District (MDAQMD)

The Mojave Desert Air Quality Management District maintains a set of rules and regulations to improve and maintain healthy air quality for the entire population within its jurisdiction. When developing new regulations, the MDAQMD must comply with complex procedures established by statutes in federal and state codes. Its regulations development process is based on the specific nature of the regulation and its potential impacts. The MDAQMD has established GHG emissions thresholds in its CEQA Guidelines but has not implemented a comprehensive GHG reduction strategy. The adopted threshold is 100,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year, or 548,000 pounds per day (LSA, 2025a, p.17).

San Bernardino Council of Governments (SBCOG)

The Town of Yucca Valley falls within the jurisdiction of the dual entity of San Bernardino County Transportation Authority (SBCTA) and San Bernardino Council of Governments (SBCOG); SBCTA primarily focuses on transportation. In response to the adoption of AB 32 and the SB 32 Scoping Plan, SBCOG developed and adopted a San Bernardino County Regional GHG Reduction Plan in 2021 that will support the county's GHG reduction target for 2030 (SBCTA, 2021). The plan includes a baseline GHG inventory and forecasts, reduction measures, and information on the implementation of a climate action plan for each of the jurisdictions included in the plan.

SBCOG, along with the two other councils of governments in the Riverside–San Bernardino–Ontario metropolitan statistical area (MSA), the Coachella Valley Association of Governments (CVAG) and the Western Riverside Council of Governments (WRCOG), has developed the Priority Climate Action Plan (PCAP), dated March 1, 2024 (SBCTA, 2024). This PCAP outlines a strategy to reduce GHG emissions across the entire MSA, drawing from both existing and newly conducted analyses. It incorporates comprehensive GHG inventories for all major sectors such as energy, transportation, solid waste, water, wastewater, and agriculture, and evaluates each sector's potential for emissions reductions based on current climate action plans. The PCAP identifies regional measures to achieve near-term GHG reductions, need for funding, and anticipated benefits for low-income and disadvantaged communities (LIDACs), among other key criteria. It also examines the costs associated with implementing these regional measures, the legal and operational authority of local jurisdictions and agencies within the MSA to carry them out, and the potential workforce impacts tied to their implementation.

Yucca Valley General Plan

The Town of Yucca Valley addresses climate change through the Open Space and Conservation Element of its General Plan (Town of Yucca Valley, 2014). This section outlines goals and policies aimed at improving and preserving air quality to support the health of residents and the local economy. The following GHG-related policies from the Open Space and Conservation Element are relevant to the proposed project:

Policy OCS 11-1: Continue participating in and supporting the San Bernardino County Regional Greenhouse Gas Reduction Plan.

Policy OCS 11-2: Promote the design of new development that utilizes the desert climate through solar orientation, strategic shading, and other sustainable building practices and technologies.

Policy OCS 11-3: Ensure the General Plan's land use, housing, and transportation goals and policies remain consistent with and contribute to the Southern California Association of Governments (SCAG) Regional Transportation Plan and Sustainable Communities Strategy to help reduce greenhouse gas emissions.

4.8.4 GHG Emissions

4.8.4.1 National Emissions

The United States is the second largest emitter of GHGs globally (behind China) and emitted approximately 6,343 million metric tons of carbon dioxide equivalent in 2022 ($MMTCO_2e$) (USEPA, 2025g), not including GHG absorbed by forests and agricultural land. The largest source of GHG in the United States (28 percent) is burning fossil fuels for transportation (USEPA, 2025g). Generating electric power accounted for the second largest portion (25 percent). The remaining 47 percent of U.S. GHG emissions were contributed by the agriculture, industry, and residential and commercial sectors.

4.8.4.2 State Emissions

The California Air Resources Board (CARB) reports that in 2022, total GHG emissions in California were 371.1 $MMTCO_2e$ (ARB, 2024). The largest source of GHG in California is burning fossil fuels for transportation (39 percent) (ARB, 2024). The industrial sector accounted for the second largest portion (23 percent). The remaining 38 percent of state GHG emissions were contributed by the agriculture, electricity, and residential and commercial sectors.

4.8.4.3 Local Emissions

The Town of Yucca Valley has not developed a climate action plan. However, the PCAP presents the town's baseline and projected emissions and compares them with the 2030 GHG Target. In 2008, Yucca Valley's community-wide GHG inventory was 20,652 $MTCO_2e$ and in 2016 it was 21,445 $MTCO_2e$. The town's GHG forecast for 2030 is 94,254 $MTCO_2e$ which falls below the goal of 106,543 $MTCO_2e$ (SBCTA, 2024).

4.8.5 Impact Thresholds

CEQA Guidelines §15064.4 provides discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. In addition, CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant, but recommends that lead agencies consider several factors that may be used in the determination of significance of project-related GHG emissions, including:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines § 15130(f) states that the effects of GHG emissions are by their very nature cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Additionally, CEQA Guidelines § 15064(h)(3) states that a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides requirements to avoid or lessen the cumulative problem.

The Town of Yucca Valley has not established GHG significance thresholds but has adopted the 2021 San Bernardino GHG reduction Plan, which outlines a GHG Development Review Process (DRP) (Atkins, 2015). All proposed projects are required to implement the GHG performance standards identified in the DRP and comply with applicable state regulations. For projects that exceed the screening threshold of 3,000 $MTCO_2e$ per year, the use of screening tables or preparation of a project-specific technical analysis is required to quantify and mitigate GHG emissions (LSA, 2025a, p. 23). Projects with emissions below 3,000 $MTCO_2e$ per year that demonstrate compliance with applicable GHG performance standards and state requirements are generally considered to have a less than significant impact on both project-level and cumulative GHG emissions.

Based on the foregoing guidance, the proposed project is evaluated against the San Bernardino County GHG screening threshold of 3,000 $MTCO_2e$ per year. In addition, the project is reviewed for consistency with the 2022 Scoping Plan and the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

4.8.6 Impact Analysis

4.8.6.1 Methodology

Short-term construction GHG emissions and long-term operational GHG emissions were assessed by LSA using the California Environmental Emissions Estimator Model (CalEEMod) Version 2022.1.1.28 (CAPCOA, 2017). This analysis focused upon emissions of CO_2, CH_4, and N_2O only. HFCs, PFCs, and SF_6 would be emitted in negligible quantities by the proposed project, so they are not discussed further.

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

<u>Less than Significant Impact</u>

California has enacted several pieces of legislation that relate to GHG emissions and climate change, many of which set aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigations are included or provided in these CEQA Guideline amendments.

GHG Significance Threshold

Neither the Town of Yucca Valley, the MDAQMD, nor the State CEQA Guidelines Amendments have adopted quantitative thresholds of significance for addressing a project's construction-related GHG emissions. Nonetheless, § 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. As required in § 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount

of GHG emissions resulting from the proposed project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the proposed project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the proposed project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

As noted above, this analysis evaluates the proposed project against the San Bernardino County GHG screening threshold of 3,000 $MTCO_2e$ per year. Construction-related GHG emissions are amortized over a 30-year project lifespan, combined with annual operational emissions, and then compared to the applicable significance threshold to assess potential impacts.

Construction GHG Emissions

Construction is an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. Only GHG emissions from onsite construction activities and offsite hauling and construction worker commuting are considered project-generated. As explained by the California Air Pollution Control Officers Association (CAPCOA) in its 2008 white paper (CAPCOA, 2008), the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* § 15145). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative onsite construction activities, and offsite hauling, and construction worker trips. All GHG emissions are identified on an annual basis.

Estimated criteria pollutant emissions from the proposed project's onsite and offsite project construction activities were calculated by LSA using CalEEMod, Version 2022.1.1.28, which was described in **Section 4.3.6**. The results of this analysis are presented in **Table 4.8-2**. The proposed project's total construction GHG emissions are estimated to be 495.4 $MTCO_2e$. To ensure that construction emissions are assessed in a quantitative sense, construction GHG emissions have been amortized over the life of the project, which is considered to be 30 years. The amortized value, **16.5 $MTCO_2e$**, has been added to the proposed project's annual operational GHG emissions.

Table 4.8-2
PROJECT CONSTRUCTION-RELATED GHG EMISSIONS

Year	Annual Emissions (MT)			
	CO_2	CH_4	N_2O	CO_2e
2024	74.1	< 0.005	< 0.005	74.4
2025	223	0.01	0.01	225
2026	194	0.01	0.01	196
Total	**491.1**	**0.02**	**0.15**	**495.4**

Source: Calculated by LSA using CalEEMod Version 2022.1.1.28 (LSA, 2025a, Attachment B).

Operational GHG Emissions

For a reasonable maximum emissions case, it was assumed that GHG emissions from the Sun Mesa Self Storage Project site are currently zero. Operational GHG emissions calculated by CalEEMod are shown in **Table 4.8-3**. Total annual unmitigated emissions from the proposed project would be 627.8 $MTCO_2e$ per year. Energy production and mobile sources account for about 83 percent of annual operational emissions.

Table 4.8-3
PROJECT OPERATIONAL GHG EMISSIONS

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	1.4
Energy Demand (Electricity & Natural Gas)	233.3
Mobile (Motor Vehicles)	288.6
Solid Waste Generation	27.7
Water Demand	60.3
Construction Emissions[a]	16.5
Total	**627.8**

Source: Calculated by LSA using CalEEMod version 2022.1.1.28 (LSA, 2025a, Attachment B).
[a]*Total construction GHG emissions were amortized over 30 years and added to those resulting from the operation of the project.*

Therefore, under the first significance criterion, GHG emissions would be less than significant, and no mitigation is necessary.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG?

Less than Significant Impact

The proposed project is required to be consistent with GHG reduction goals established in CARB's 2022 Scoping Plan and SCAG's 2024–2050 RTP/SCS.

The 2022 Scoping Plan outlines California's strategy to meet its climate goals, including reducing GHG emissions to 40 percent below 1990 levels by 2030, as set by EO B-30-15 and codified in SB 32. It builds on previous plans under AB 32 and supports the path towards the State's goal of carbon neutrality by 2045, as established by AB 1279. The scoping plan evaluates progress toward 2030 targets and identifies strategies across clean energy, transportation, land use, and natural systems to achieve long-term climate, health, and equity outcomes.

Energy-efficient measures outlined in the scoping plan aim to reduce building-related emissions through improved standards, new technologies, and broader use of green practices. The proposed project will eliminate natural gas use and comply with current Title 24 energy efficiency and green building standards. Because the project does not rely on natural gas, it is consistent with California's 2045 carbon neutrality target and would comply with applicable energy measures. The proposed project supports water conservation goals by incorporating low-water landscaping and complying with the latest Title 24 standards and the California Model Water Efficient Landscape Ordinance. These measures help reduce water use and related GHG emissions, ensuring the project does not conflict with state water efficiency objectives. Although regional transportation GHG targets don't directly apply to the project, vehicles accessing the site would comply with state clean car standards such as Pavley II (LEV III), which significantly reduce emissions. Therefore, the project would not conflict with transportation-related GHG reduction measures. The proposed project would not conflict with existing State regulations adopted to achieve the overall GHG emission reduction goals identified in the 2022 Scoping Plan.

SCAG's 2024–2050 RTP/SCS promotes land use and transportation strategies that reduce GHG emissions through transit-oriented development, complete streets, and integrated planning. While local plans aren't required to align with the RTP/SCS, incentives are provided for consistency. The proposed project aligns with local land use and zoning, does not trigger CEQA criteria for regional significance, and would not conflict with SCAG's regional GHG reduction goals.

The project will comply with all relevant energy-reducing provisions of Title 24, which indirectly reduce GHG emissions by reducing energy use. Implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. The proposed project will be consistent with state and regional GHG reduction goals and would not conflict with any plan adopted for reducing GHG emissions. Therefore, the project's GHG emissions impacts will be less than significant.

4.9 Hazards and Hazardous Materials

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

The analysis in this section relies on the findings of the Phase I Environmental Site Assessment (Phase I ESA) prepared by DRP Enterprises, LLC., initially dated October 31, 2024, and updated on July 17, 2025 (DRP, 2024a) (see **Appendix F**). The Phase I ESA was conducted in accordance with ASTM E1527-21 standards and includes a site reconnaissance, historical land use review, and regulatory database search. The assessment evaluates whether the project site contains Recognized Environmental Conditions (RECs), defined as the presence or likely presence of hazardous substances or petroleum products under conditions that indicate a potential threat to human health or the environment.

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

<u>Less than Significant Impact</u>

The proposed project would involve standard construction activities that may require the temporary use and transport of hazardous materials such as fuels, lubricants, and solvents. These materials would be used in accordance with all applicable local, state, and federal regulations, including those enforced by the California Department of Toxic Substances Control (DTSC) and the Occupational Safety and Health Administration (OSHA). All hazardous materials would be stored, handled, and disposed of in compliance with regulatory standards to minimize risks to workers, the public, and the environment.

No industrial uses or operations involving large-scale hazardous materials are proposed as part of the project. The Phase I ESA did not identify any RECs that would elevate the baseline risk. Therefore, the project would have a less than significant impact to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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

Less than Significant Impact

The project involves typical construction-related activities that could result in the temporary use and storage of hazardous materials such as fuels, lubricants, and adhesives. These activities inherently carry a low potential for accidental release; however, the risk is minimized through compliance with existing federal, state, and local regulations, and applicable California Fire Code provisions.

The Phase I ESA did not identify any RECs or existing contamination that would increase the likelihood of hazardous material release due to upset conditions. No unusually hazardous uses or activities are proposed.

Compliance with best management practices (BMPs) and regulatory oversight ensures that the potential for upset or accident conditions resulting in the release of hazardous materials would be adequately managed and contained and have a less than significant impact.

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

No Impact

A review of available data indicates no existing or proposed schools within 0.25 mile of the project site. The nearest school, Yucca Mesa Elementary School, is located approximately 1.7 miles northwest of the project site.

The project would involve only typical construction activities and would not emit hazardous emissions or handle acutely hazardous substances, wastes, or operations. Any temporary use of fuels, lubricants, or adhesives would be managed under standard regulatory controls, including requirements under California Health and Safety Code §25507, Cal/OSHA, and local Fire Code.

Given the lack of nearby schools and the implementation of appropriate handling practices for any minor hazardous materials used during construction, the project would not result in any impacts related to hazardous emissions or exposure near schools.

d) Would the project 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 review of the Phase I ESA confirms that the site is not listed on any hazardous materials registries, including those identified under Government Code § 65962.5 (the "Cortese List"), such as leaking underground storage tanks (GeoTracker), hazardous waste facilities (EnviroStor), or active cleanup orders as shown on **Figure 4.9-1**. Regulatory database searches and agency queries identified no records associating the site or adjoining parcels with any listed hazardous site.

The absence of listing under § 65962.5 indicates no heightened baseline risk. Accordingly, the project would not create a significant hazard to the public or environment due to its presence on any such list. Therefore, the project would have no impact.

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 site is not located within any designated airport influence area or safety zones established by the Airport Comprehensive Land Use Plan (CLUP) for Yucca Valley Airport (County of San Bernardino, 1992). Although the project site lies 2.5 miles north of the Yucca Valley Airport as detailed in **Figure 4.9-2**, it is situated outside of all airport compatibility zones identified in the CLUP. Therefore, the project would not result in a safety hazard or expose people residing or working in the project area to excessive noise levels associated with airport operations. No land use conflicts, or safety concerns related to airport proximity have been identified, and there would be no impact.

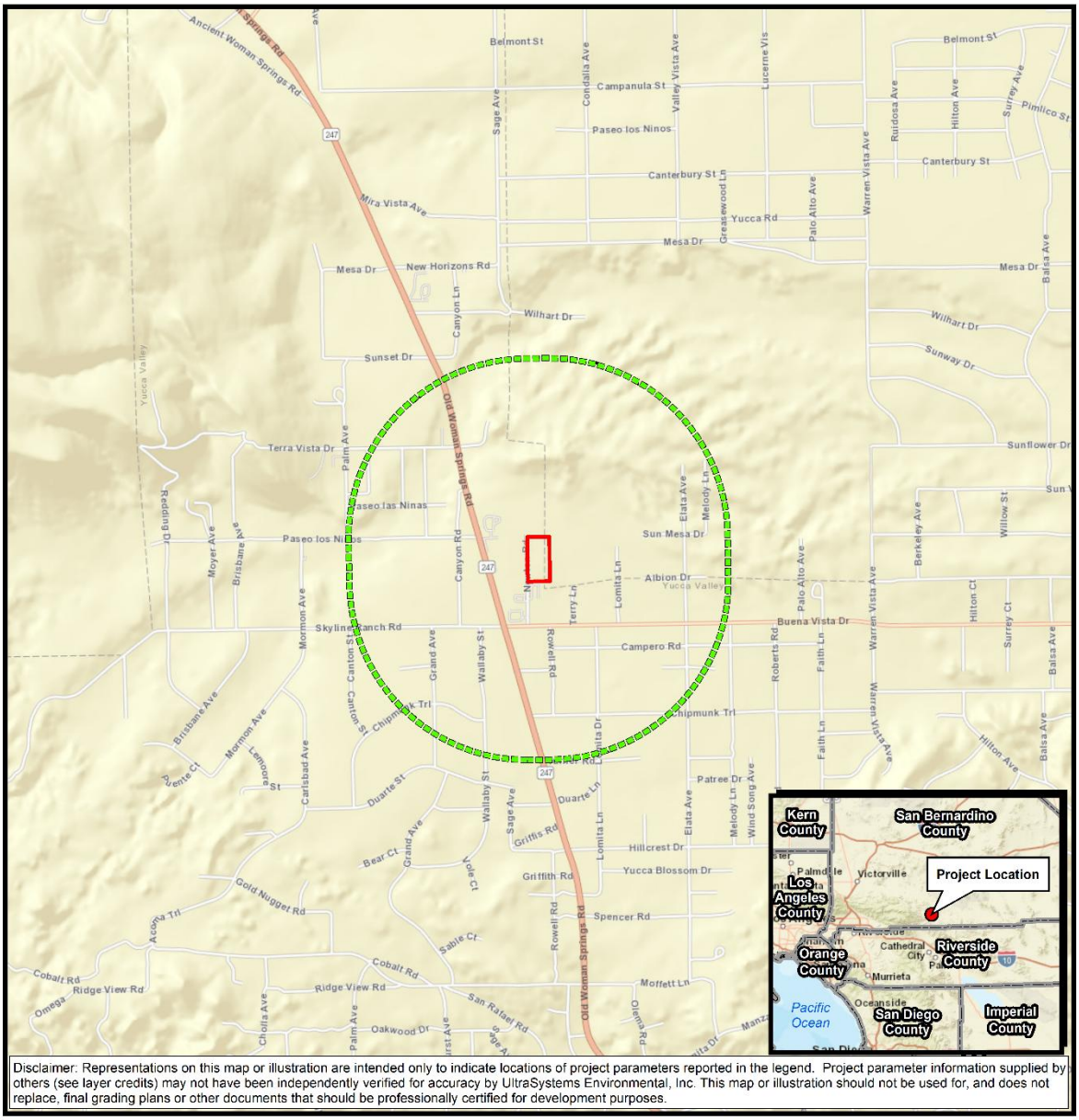
f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact

The project would not impair the implementation of, or physically interfere with, any adopted emergency response or evacuation plan. Located at the southeast corner of Newton Lane and Sun Mesa Drive, the project includes two 30-foot-wide driveways and internal circulation aisles designed in accordance with the California Fire Code and the Town of Yucca Valley's regulations. Offsite improvements, such as half-width roadway paving, sidewalks, and curb and gutter along the project's boundaries, would be completed under an encroachment permit issued by the Town's Engineering Department, ensuring that emergency access is preserved throughout construction and operation.

The project is consistent with the Town's Local Hazard Mitigation Plan (LHMP), which emphasizes emergency access and hazard avoidance, and supports the goals of the San Bernardino County Emergency Operations Plan (EOP), which prioritizes route clearance and emergency coordination. Construction traffic will be managed to preserve roadway access, and plans will be reviewed by the County Fire Protection District for compliance with fire and emergency access standards. Therefore, the project would have a less than significant impact on emergency response or evacuation plans.

Figure 4.9-1
CORTESE LIST SITE MAP



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_Cortese_2025_07_27.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community California Department of Conservation, 2019; CALAtlas, 2022; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Scale: 1:24,000

N

0 625 1,250 Feet

0 250 500 Meters

Legend

Project Boundary

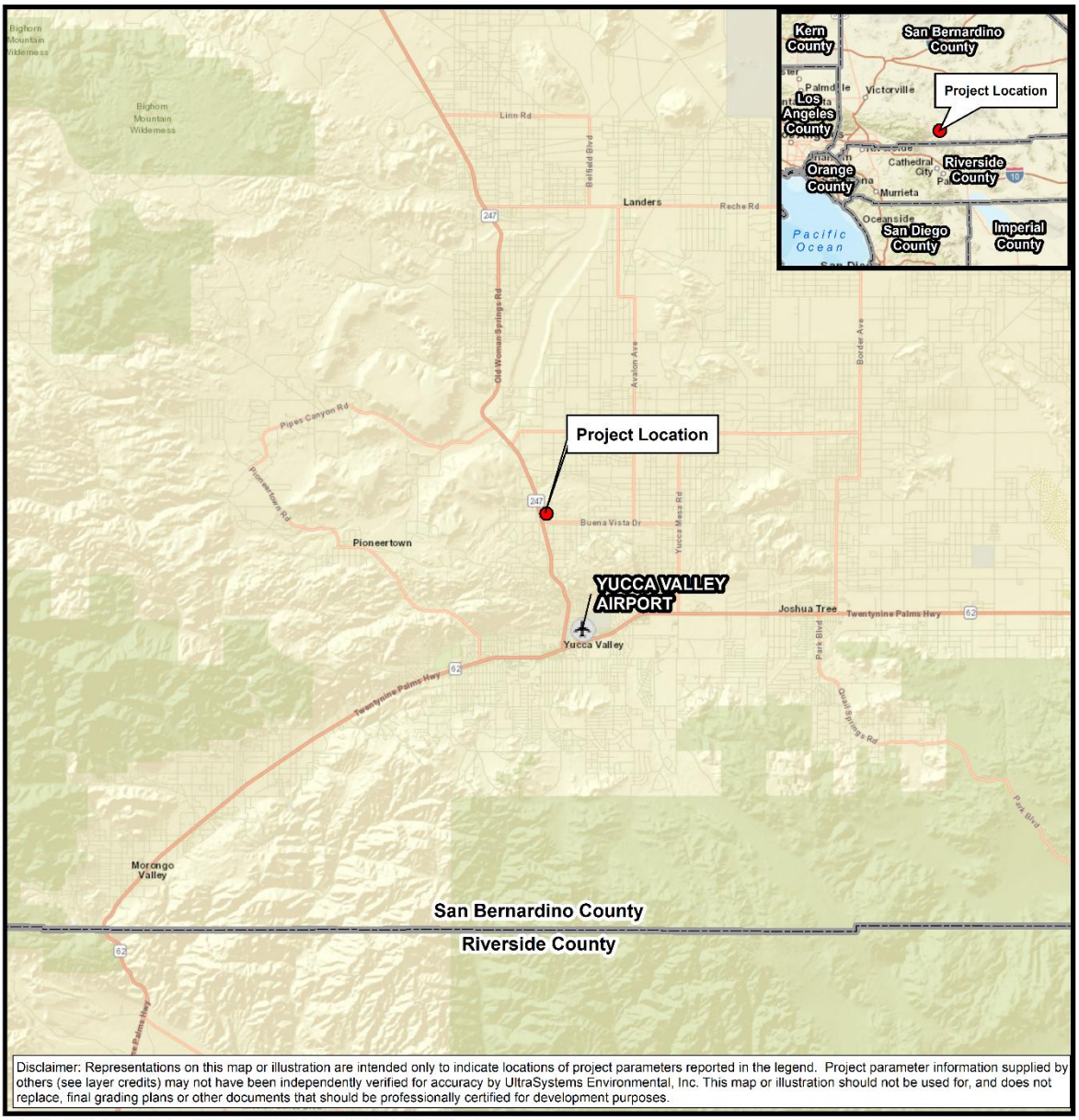
Half-Mile Radius

There are no Cortese Act Sites within a half mile of the project site.

Sun Mesa Self-Storage Facility
Cortese Act Sites

UltraSystems environmental•management•planning

Figure 4.9-2
AIRPORT LOCATION MAP



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_9_Airports_2025_07_18.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, 2016; UltraSystems Environmental, Inc., 2025.

July 18, 2025

Scale: 1:190,080

N

0 1.5 3 Miles

0 1.5 3 Kilometers

Legend

- Projct Location
- County Boundary
- Community

Sun Mesa Self-Storage Facility
Airports

UltraSystems environmental•management•planning

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

No Impact

As detailed further in **Section 4.20**, the project site is located within a State Responsibility Area (SRA) but is not designated as a "Very High Fire Hazard Severity Zone" (VHFHSZ) per the most recent CAL FIRE Fire Hazard Severity Zone maps. The surrounding area consists of low-density development and natural desert vegetation with moderate fuel loads. Local fire protection services are provided by San Bernardino County Fire Protection District, and the site is served by existing fire infrastructure, including maintained access routes.

The project will implement all applicable California Building Code Chapter 7A Fire-Safe Construction Standards, including fire-resistant materials, defensible space, and fire apparatus access. Construction and operation will also adhere to the requirements of Public Resources Code §§ 4290 and 4291, including vegetation clearance and emergency water supply availability.

Given the site's location outside of a VHFHSZ and compliance with modern fire safety regulations, the project would not expose people or structures to a significant wildfire risk and no impact would occur.

4.10 Hydrology and Water Quality

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

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

<u>Less than Significant Impact</u>

The California State Water Resources Control Board requires its nine Regional Water Quality Control Boards (RWQCBs) to develop water quality control plans (Basin Plans) designed to preserve and enhance water quality and protect the beneficial uses of all Regional waters. Specifically, Basin Plans

designate beneficial uses for surface waters and groundwater, set narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State antidegradation policy, and describe implementation programs to protect all waters in the Regions (RWQCB 1995). In addition, Basin Plans incorporate by reference all applicable State and Regional Board plans and policies, and other pertinent water quality policies and regulations. The proposed project is under the jurisdiction of the Colorado River (Region 7) RWQCB.

As shown in **Figure 4.10-1,** *USGS Surface Waters and Watersheds*, the project site is located within the USGS Town of Joshua Tree sub-watershed that spans about 20 square miles of the central and western Morongo Basin. Drainage within the Joshua Tree sub-watershed is internal, meaning that it terminates into desert valleys, and does not reach the ocean (USGS, 2009).

Much of the project site is a southeast-facing slope with grades up to 14 percent in the southern section of the site and as slight as 0.1 percent in the northern section of the site (DRP, 2024a, p. 7).

A drainage study for the project was completed DRP Enterprises, LLC November 10, 2024 (DRP, 2024b) and is included as **Appendix G2**. The project site and the area tributary to the site (i.e., west of the site) is divided into two drainage areas, Area A and Area B, depicted on **Figure 4.10-2**. The areas in acres, and the peak runoff estimated from a 100-year, 1-hour storm are listed below in **Table 4.10-1**.

Table 4.10-1
PROJECT SITE AND TRIBUTARY AREA RUNOFF RATES

Drainage Area	Area, Acres			Peak Flow (Q), cubic feet per second (cfs), 100-year storm, existing conditions		
	Onsite	Offsite	Total	Onsite	Offsite	Total
A	2.46	4.48	6.94	6.51	17.54	24.05
B	2.11	7.89	10	3.30	30.09	33.40

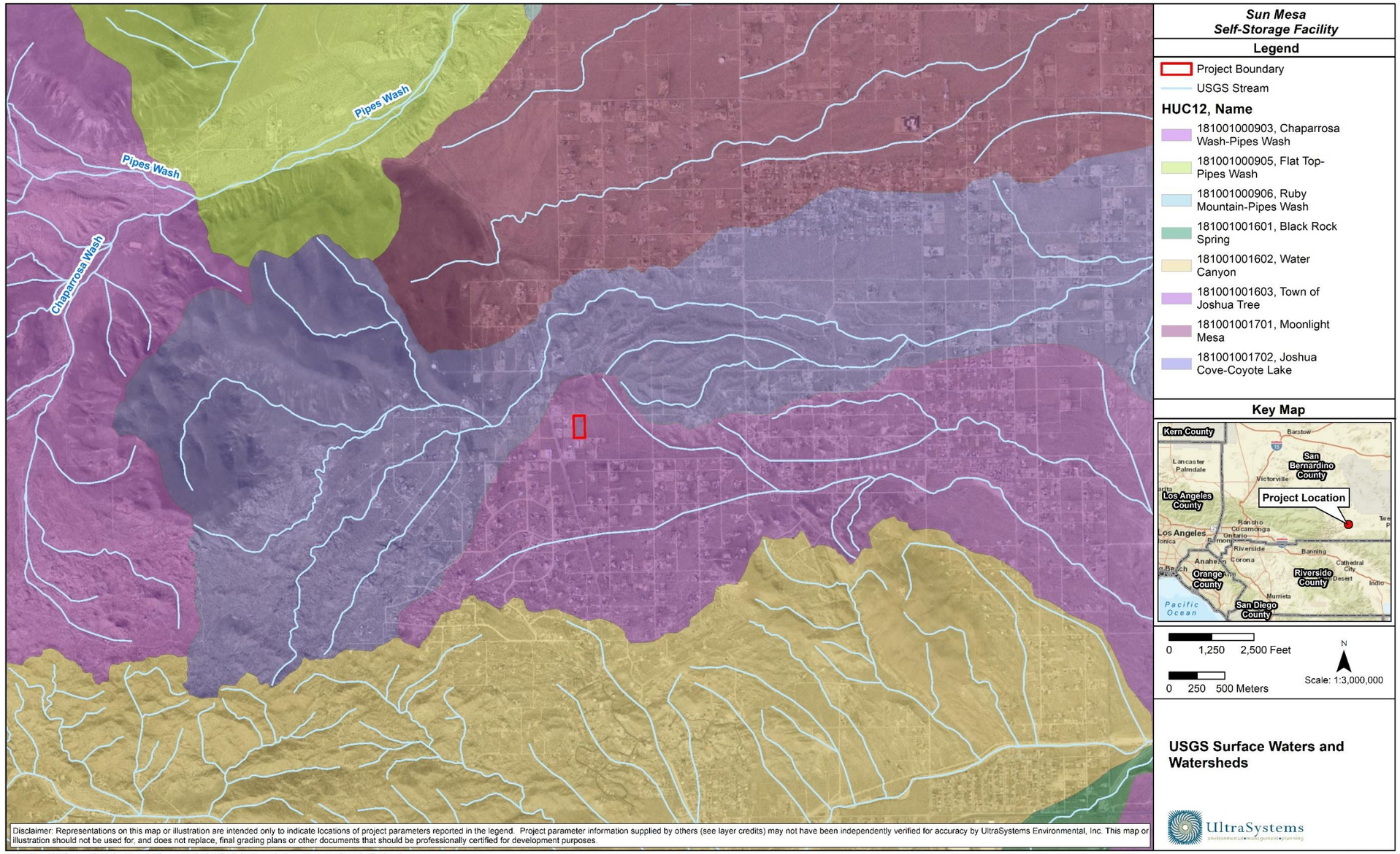
Source: DRP, 2024b

Development of the project has the potential to result in two types of water quality impacts: (1) short-term impacts due to construction-related discharges; and (2) long-term impacts from operation. Temporary soil disturbance would occur during project construction, due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. Disturbed soils are susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project area. Erosion and sedimentation affect water quality of receiving waters through interference with photosynthesis, oxygen exchange, and respiration, growth, and reproduction of aquatic species. Runoff from construction sites may include sediments and contaminants such as oils, fuels, paints, and solvents. Additionally, other pollutants such as nutrients, trace metals, and hydrocarbons can attach to sediment and be carried by stormwater into storm drains which discharge eventually to the Pacific Ocean.

Spills and mishandling of construction materials and waste may also potentially leave the project site and negatively impact water quality. The use of construction equipment and machinery may potentially result in contamination from petroleum products, hydraulic fluids, and heavy metals. Contamination from building preparation materials such as paints and solvents, and landscaping materials such as fertilizers, pesticides, and herbicides may also potentially degrade water quality

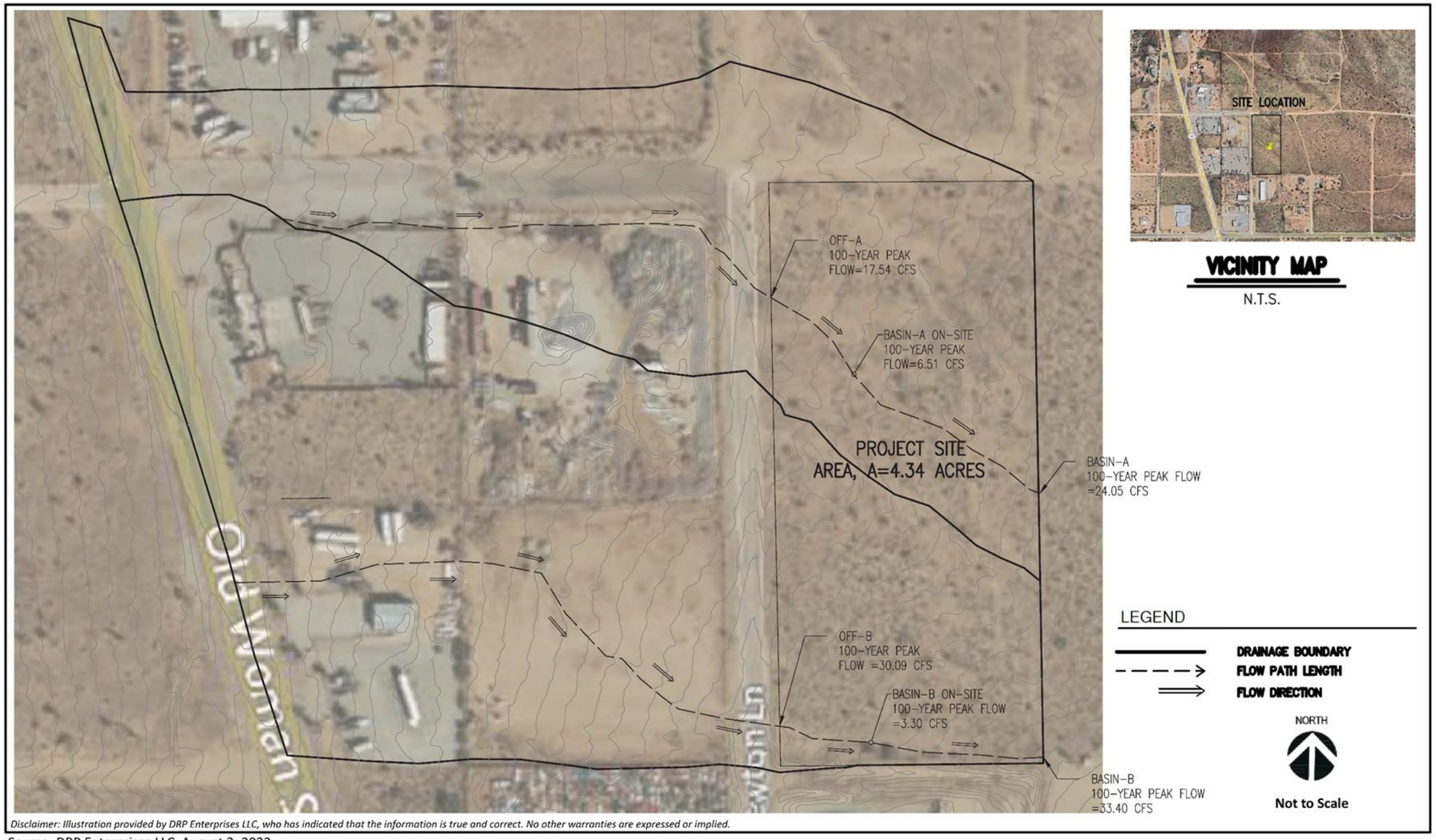
during project construction. Trash and demolition debris may also be carried into storm drains and discharged into receiving waters.

Figure 4.10-1
USGS SURFACE WATERS AND WATERSHEDS



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\BIO\7335_SunMesa_Surface_Water_11x17_2025_07_25.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; USGS, 2022; UltraSystems Environmental, Inc., 2025.

Figure 4.10-2
EXISTING HYDROLOGY MAP



Source: DRP Enterprises LLC, August 3, 2022.

Sun Mesa Self-Storage Facility

Existing Condition Hydrology Map

UltraSystems
environmental•management•planning

Construction Pollutants Control

Project construction could generate contaminants – including bacteria and viruses, metals, nutrients, pesticides, organic compounds, sediments, trash and debris, oil and grease, and oxygen-demanding substances – that could contaminate stormwater. Grading or construction operations under Town grading or construction permits are prohibited from allowing loose trash or debris to accumulate or to be carried offsite by wind or water; are required to contain trash and debris; and are required to provide for waste collection to prevent trash containers from overfilling, by Town Municipal Code Chapter 8.03, Construction Site Maintenance and Trash Containment (Codelibrary.amlegal.com, 2025). Construction, grading, excavation, and land clearing operations are required to use measures to minimize wind erosion under MDAQMD Rule 403 (MDAQMD, 2020c). Grading and construction activities pursuant to the General Plan Update would comply with existing laws and regulations aimed at minimizing or eliminating pollution of stormwater with trash and debris and pollution of air and water by dust (Town of Yucca Valley, 2014, p. 5.8-24). Construction water quality impacts would be less than significant after compliance with the above-specified municipal code chapter and regulations.

Note that while construction projects one acre or larger in much of California must obtain coverage under the Statewide General Construction Permit (SGCP) issued by the State Water Resources Control Board, the SGCP only applies to areas where receiving waters are Waters of the United States (WOUS).[14] Surface waters in Yucca Valley are not WOUS, and thus the SGCP does not apply to construction projects in Yucca Valley.

Operational Pollutant Controls

Project operation could generate the same categories of pollutants that project construction could generate. The project includes an infiltration basin in the southwest corner of the project site with capacity of 13,243 cubic feet. Infiltration basins are highly effective at removing sediment, nutrients, trash, metals, bacteria, oil and grease, and organics (CASQA, 2003, p. TC-11-1). Project operational water quality impacts would be less than significant.

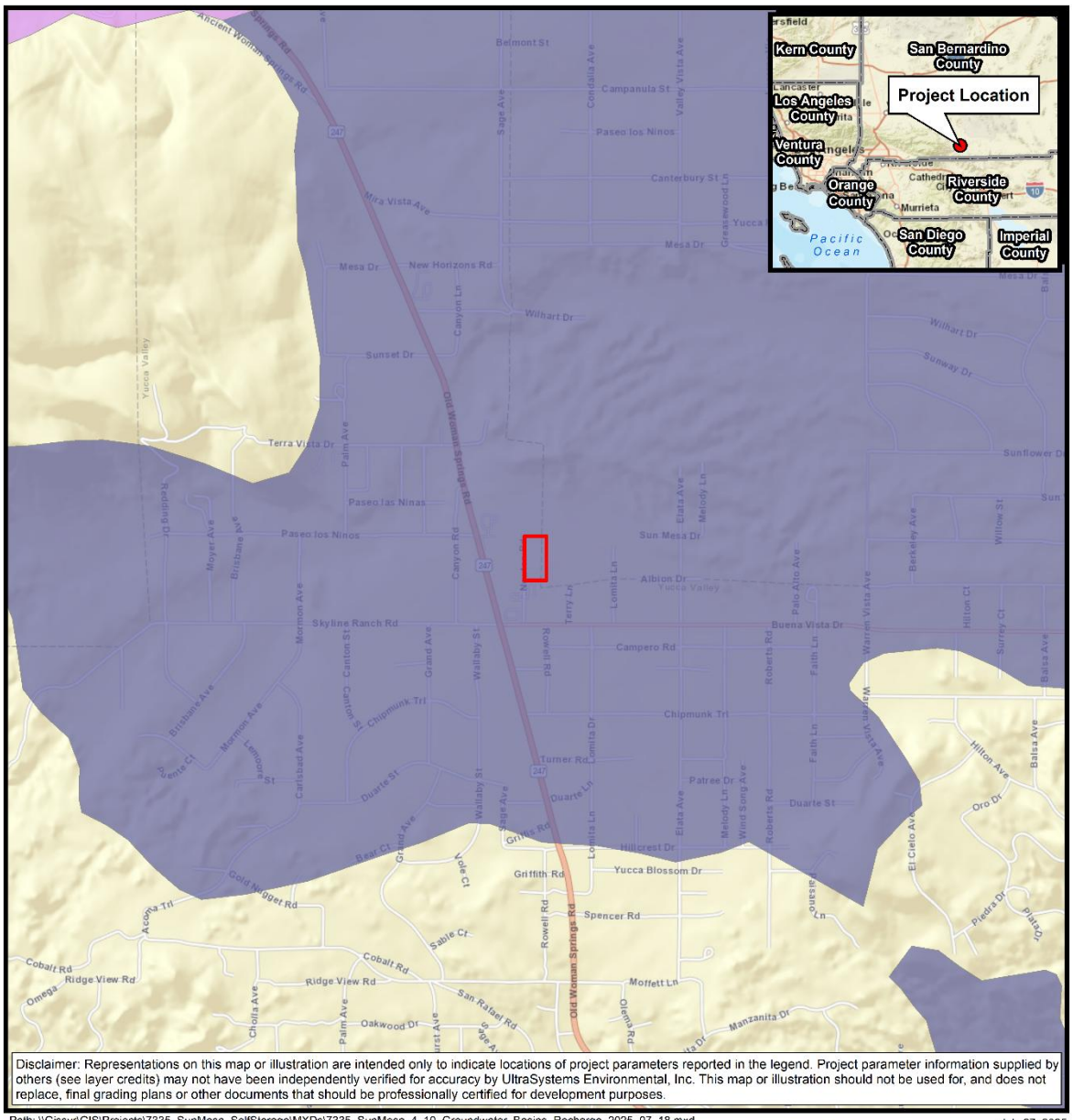
b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

<u>Less than Significant Impact</u>

The project site is above the Copper Mountain Valley groundwater basin (CMVGWB), as shown on **Figure 4.10-3**. The Basin covers approximately 47 square miles in the north-central part of the Morongo Basin (DWR, 2003). While the project site is pervious, it is not used for intentional groundwater recharge.

[14] Waters of the U.S. include waters that are or have been used, or could be used, in interstate or foreign commerce; interstate waters including interstate wetlands; tributaries of those categories of waters; impoundments of any of the preceding categories of waters; territorial seas; and wetlands adjacent to those categories of waters (USEPA, 2025).

Figure 4.10-3
GROUNDWATER BASINS MAP



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_10_Groundwater_Basins_Recharge_2025_07_18.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; California Department of Water Resources 2021-(Bulletin 118, 2021); UltraSystems Environmental, Inc., 2025.

July 27, 2025

Scale: 1:24,000

N

0 1,000 2,000 Feet

0 300 600 Meters

Legend

- Project Boundary
- USGS Waterbody

CDWR Bulletin 118 Groundwater Basins-Subbasins (2021):

- AMES VALLEY
- COPPER MOUNTAIN VALLEY

Sun Mesa Self-Storage Facility

Groundwater Basins, Subbasins and Recharge Basins

UltraSystems environmental•management•planning

The project site is in the Hi-Desert Water District (HDWD) service area. HDWD water supplies are groundwater from the Warren Valley Groundwater Basin south of the CMVGWB, and the Ames Valley Groundwater Basin north of the CMVGWB (HDWD, 2021, p. 3-2). HDWD forecasts that it will have sufficient water supplies to meet demands in normal water year, single-dry-year, and multiple-dry-year conditions over the 2020-2040 period (HDWD, 2021, p. 5-2). Project operation is estimated to use about 2,243 gallons per day (gpd) of water based on a wastewater generation factor of 20 gpd per 1,000 square feet (City of Los Angeles, 2006); and taking water demand to be 125 percent of wastewater generation.

Project water demand would not substantially decrease groundwater supplies or interfere with groundwater recharge, and impacts would be less than significant.

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

i) Result in substantial erosion or siltation on or offsite;

<u>Less Than Significant Impact</u>

The project site is divided into two drainage areas. Runoff from offsite portions of the project site (extending west from the site to SR-247) passes through the site, combining with runoff from the site, and continues eastward (DRP, 2024b, p. 7). The project site is in the Town of Joshua Tree sub-watershed.

Construction

The project site would be most susceptible to erosion during the construction phase, when soil is exposed, and before landscaped areas have been installed. To minimize the potential for water and wind erosion, the project would be required to obtain coverage under the Statewide General Construction Permit issued by the State Water Resources Control Board (Order No. 2022-0057-DWQ). Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater.

Construction BMPs are grouped in six categories: erosion control (prevents soil particles from being detached from soil surface), sediment control (prevents soil particles from being transported offsite by water and being deposited elsewhere), wind erosion control, tracking control (prevents soil from being tracked offsite by vehicles), non-stormwater management controls (prohibits discharges other than stormwater, such as those from cleaning, maintenance, and fueling of vehicles and equipment), and waste management and controls (good housekeeping practices) (CASQA, 2023). Construction impacts would be less than significant after implementation of erosion control and sediment control BMPs.

Operation

The project would be developed with a mix of impervious surfaces such as concrete and pavement and landscaped areas, including landscaping along the site boundary. The project includes drainage improvements consisting of two concrete ribbon gutters (i.e., shallow v-shaped concrete gutters,

typically in the medians of driveways or drive aisles) extending north-south – one through the middle of the site, and one near the east site boundary – and an infiltration basin in the southwest corner of the site. The design capture volume of the infiltration basin is 13,243 cubic feet (DRP, 2024b, p. 17). Infiltration basins are highly effective at removing sediment (CASQA, 2003, p. TC-11-1). The project would have less than significant impacts related to soil erosion or loss of topsoil and mitigation is not required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact

The proposed infiltration basin would have capacity for runoff from the project site in post-project conditions; that is, 13,243 cubic feet. The site is estimated to be 90 percent impervious at project completion (DRP, 2024b, p. 17). Project development would not increase the rate or amount of runoff in a manner that would cause flooding on- or off-site.

Project stormwater quality impacts would be less than significant, as previously shown in the analysis under 4.10.a above.

iv) Impede or redirect flood flows?

No Impact

The project site is in Flood Hazard Zone X, meaning that it is outside of 100-year and 500-year flood zones (FEMA, 2022), as shown on **Figure 4.10-4**. The project site is located outside the nearest floodplain and the proposed project would not impede or redirect flood flows. No impact would occur, and mitigation is not required.

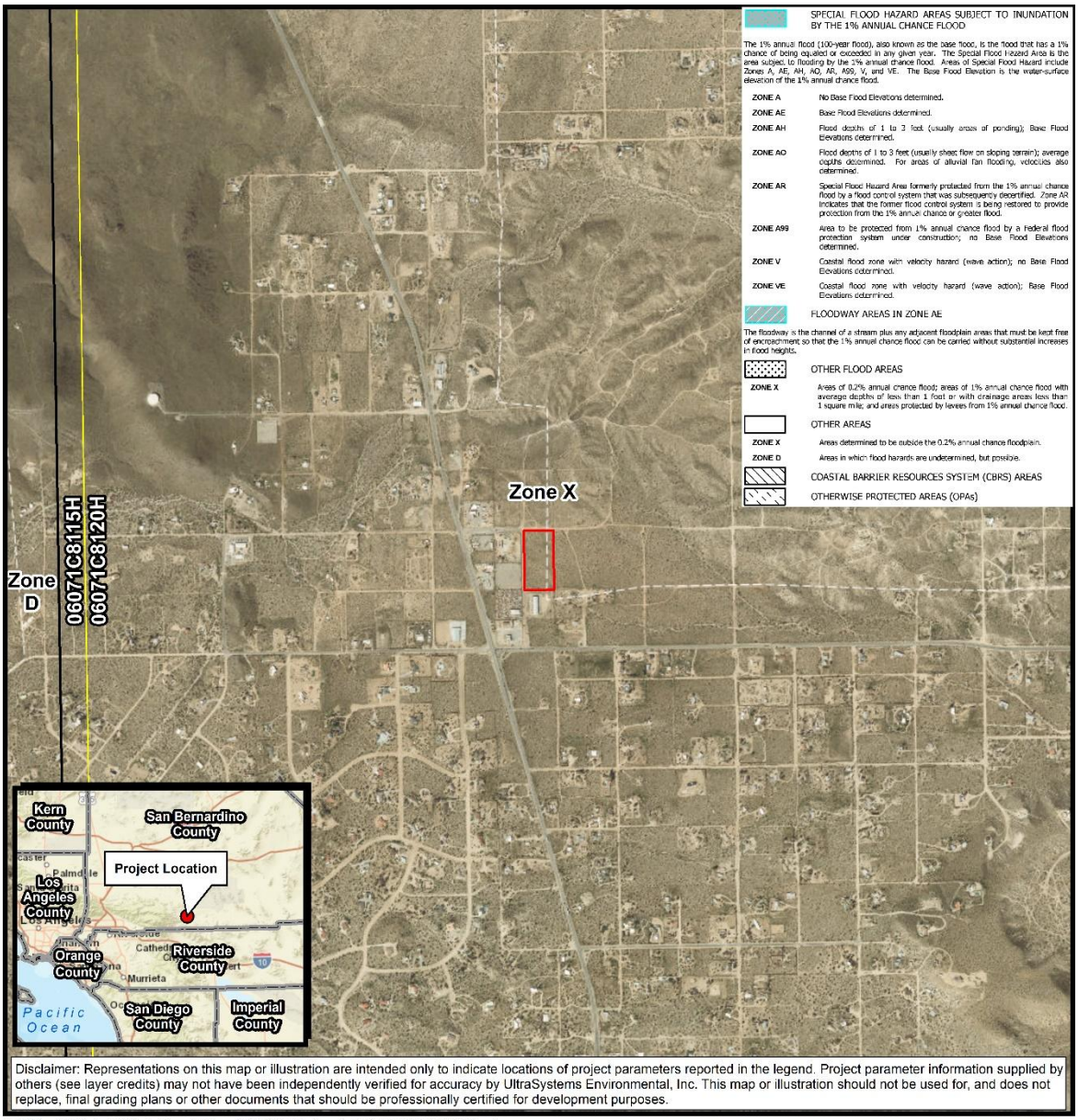
d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact

The project site is not within any dam inundation areas mapped by the California Division of Safety of Dams (DWR, 2025). The project site is also not within any dam inundation areas mapped on the U.S. Army Corps of Engineers National Inventory of Dams (USACE, 2025). A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. No water bodies are near enough to the project site such that project development would risk release of pollutants due to flooding from a seiche or from dam inundation.

As discussed previously, the project site is located outside the 500-year floodplain and would not be at risk of inundation by flood hazards.

Figure 4.10-4
FLOOD HAZARD ZONES MAP



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_10_FEMA_FIRM_2025_07_28.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community FEMA, April 2022; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Legend
Project Boundary
FEMA FIRM Panel Boundary

Sun Mesa Self-Storage Development
FEMA FIRM

Scale: 1:18,000

N

0 750 1,500 Feet

0 150 300 Meters

UltraSystems environmental•management•planning

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. Several mountain ranges and topographical barriers are interposed between the project site and the Pacific Ocean; thus, the project is not at risk of flooding due to tsunamis.

No impact would occur.

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

No Impact

The water quality control plan ("basin plan") in effect for the project region is that for the Colorado River Basin, issued by the Colorado River RWQCB in 2023. The project would comply with the basin plan through adherence with the Town of Yucca Valley Municipal Code Chapter 8.03; MDAQMD Rule 403; and construction, operation, and maintenance of the proposed infiltration basin.

No sustainable groundwater management plan has been prepared for the Copper Mountain Valley groundwater basin, and the basin is designated very low priority for development of such a plan (DWR, 2025a). No impact would occur.

4.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

a) Would the project physically divide an established community?

No Impact

The project site is located to the southeast of the intersection of Newton Lane and Sun Mesa Drive in the Town of Yucca Valley. The surrounding area includes vacant desert land and sparse industrial development. The property directly to the north abuts the Sun Mesa dedication and dirt roadway; this adjacent lot is currently vacant. The parcel to the north is zoned as Industrial Mixed Use SPA. To the east, the neighboring parcel is commercially zoned and also vacant. The properties to both the south and west are developed with existing commercial uses. The site is currently undeveloped and does not function as a thoroughfare or access point between any residential areas. As such, development of the proposed self-storage facility would not physically divide an established community, and no impact would occur.

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

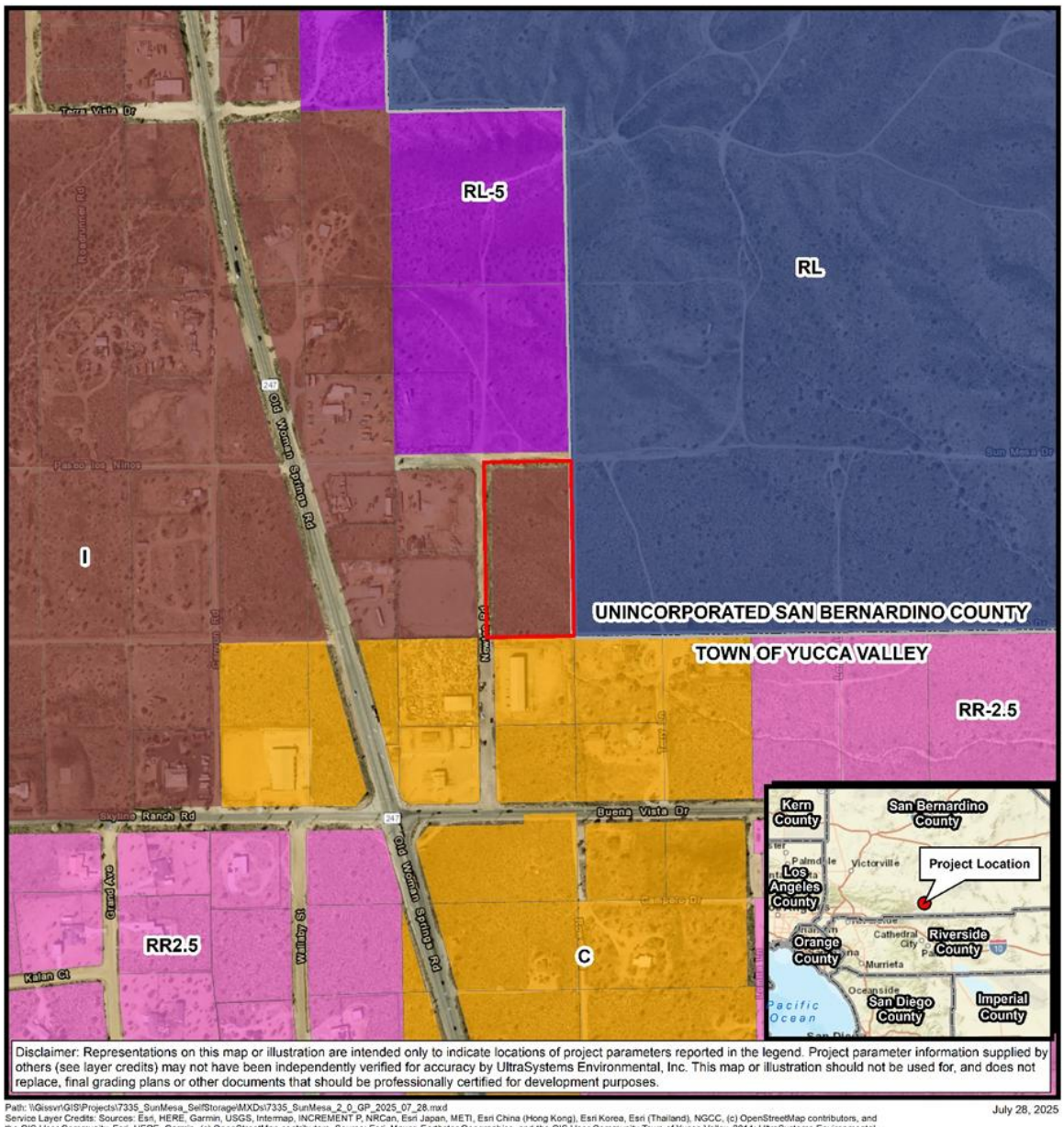
No Impact

The project site has a General Plan land use designation of Industrial (I) (see **Figure 4.11-1**) and is zoned Industrial (see **Figure 4.11-2**) within the Rural Mixed Use Special Policy Area (SPA) of the Town of Yucca Valley as shown on the Town of Yucca Valley General Plan Land Use Map (Town of Yucca Valley, 2014. p. Figure LU-1).

The "Rural Mixed Use SPA" in the City of Yucca Valley is a specific zoning overlay that allows for a blend of rural and light industrial/commercial uses, including the potential for a single-family residence when associated with an industrial business. The SPA often functions as an overlay on areas already zoned for industrial use, allowing for the unique addition of a single-family residence when associated with a business on the same property (Town of Yucca Valley, 2014. p. 2-22).

The proposed self-storage facility is consistent with the intent of the SRA. The project does not include residential or sensitive uses and is designed to maintain compatibility with adjacent developments. The project would not conflict with the land use goals or policies established for the Mixed Uses SRA and would represent an appropriate use that aligns with the Town's long-term land use planning objectives. Therefore, the project would have no impact in this regard.

Figure 4.11-1
GENERAL PLAN LAND USE DESIGNATION



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_2_0_GP_2025_07_28.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community Town of Yucca Valley, 2014; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Scale: 1:6,000

N

0 250 500 Feet

0 50 100 Meters

Legend

- City Boundary
- Project Boundary

San Bernardino County General Plan Land Use

- RL: Rural Living

Town of Yucca Valley General Plan Land Use

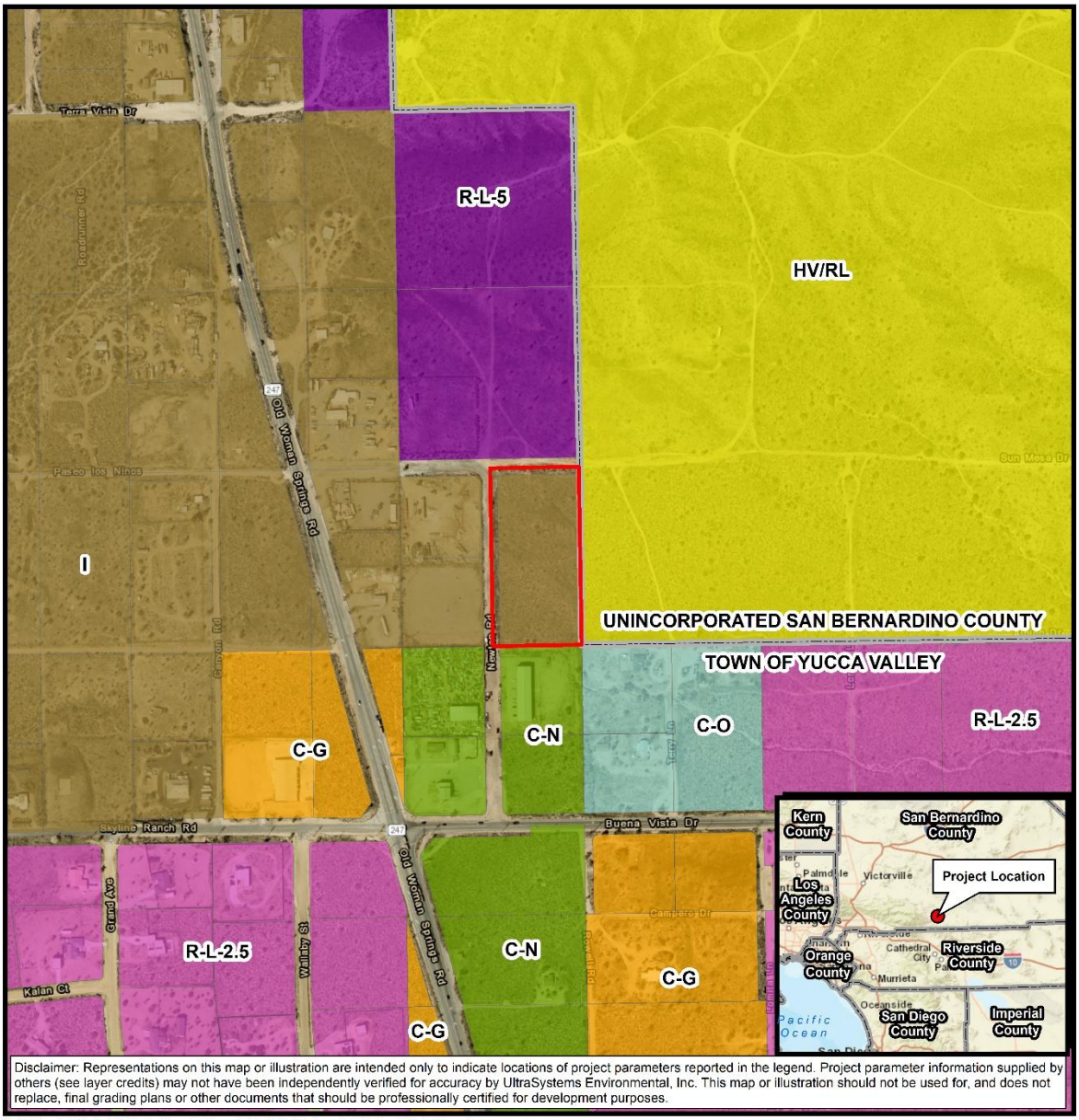
- C: Commercial
- I: Industrial
- RL-5: Rural Living
- RR-2.5: Rural Residential, One dwelling unit/2.5 acres

Sun Mesa Self-Storage Facility

General Plan Land Use Designation

UltraSystems environmental•management•planning

Figure 4.11-2
ZONING DESIGNATION



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_2_0_Zoning_2025_07_28.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community Town of Yucca Valley, 2014; UltraSystems Environmental, Inc., 2025.

July 28, 2025

Scale: 1:6,000

N

0 250 500 Feet

0 50 100 Meters

Legend

- Project Boundary
- City Boundary

San Bernardino County Zoning

- HV/RL

Town of Yucca Valley Zoning

- C-G: General Commercial
- C-N: Neighborhood Commercial
- C-O: Office Commercial
- I: Industrial
- R-L-2.5: Rural Living 1 du / 2.5 ac.
- R-L-5: Rural Living 1 du / 5 ac.

Sun Mesa Self-Storage Facility
Zoning Designation

UltraSystems environmental•management•planning

Under CEQA, a conflict may be significant if the project would conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. For the Town's General Plan Land Use Element, applicable provisions include:

- Policy LU 1-1 Encourage infill development to maximize the efficiency of existing and planned: Although the project is not considered infill, it would not conflict with Policy LU 1-1 because it would be developed within the Town's existing service context and would not require extension of major public utilities (e.g., it would use an on-site septic system rather than new sewer trunk extensions). In addition, the required frontage improvements along Newton Lane and Sun Mesa Drive (e.g., paving and associated curb/gutter/sidewalk improvements where required) would enhance the efficiency and safety of existing and planned local circulation infrastructure serving the site, consistent with the intent of maximizing efficiency of services, facilities, and infrastructure under LU 1-1.

- Policy LU 1-2 Require that adjacent land uses and development types complement one another: : A self-storage facility is typically a low-occupancy, low-intensity use that can be designed to complement surrounding commercial/industrial uses, consistent with Policy LU 1-2.

- Policy LU 1-16 Require high quality building design, property maintenance, amenities for pedestrian access, and adequate circulation, utilities, and infrastructure: The project would be consistent with Policy LU 1-16 because it includes a planned site layout that can be conditioned through the Town's development review process to meet high-quality building design and ongoing property maintenance standards, and it incorporates features that support pedestrian access and circulation. The project also provides adequate infrastructure and circulation improvements through required frontage improvements (e.g., paving and associated curb/gutter/sidewalk improvements where required) along Newton Lane and Sun Mesa Drive, and internal drive aisles that facilitate vehicle and emergency access. Utilities and infrastructure would be provided through standard utility connections and an on-site septic system designed to applicable County requirements, ensuring adequate service without requiring off-site wastewater extensions.

Table 4.11-1
LAND USE CONSISTENCY ANALYSIS

Goal / Policy	Consistency Analysis
GOAL LU 1: A balanced mixture of integrated land uses that provide desirable neighborhoods, vibrant commercial districts, passive and active open spaces, a strong economic and employment base, appropriate public facilities and services, and fiscal sustainability.	
General Policies	
Policy LU 1-1: Encourage infill development to maximize the efficiency of existing and planned public services, facilities, and infrastructure.	**Consistent.** The project is a proposed development within an existing industrially zoned area, maximizing use of existing roads and utilities on Newton Lane and Sun Mesa Drive and proposing improvements where necessary.
Policy LU 1-2: Require that adjacent land uses and development types complement one another.	**Consistent.** The proposed self-storage use is low-impact and compatible with industrial zoning; it includes perimeter fencing and landscaping to visually buffer any adjacent residential or commercial areas.

Goal / Policy	Consistency Analysis
Policy LU 1-3: Require new projects to pay their fair share cost of or make necessary improvements to public facilities, infrastructure, and services that are impacted by the demands generated by new development.	**Consistent.** The project includes off-site road improvements, water connections, septic system and fire access per Town requirements, fulfilling obligations for infrastructure impact mitigation.
Policy LU 1-5: Encourage land use development patterns that preserve the Town's scenic resources, such as ridgelines and hillsides.	**Consistent.** The site is in a flat, previously disturbed area and avoids visual intrusion on ridgelines or hillsides.
Commercial and Industrial Policies	
Policy LU 1-15: Maintain Yucca Valley's position as the economic hub of the Morongo Basin. Support a broad range of commercial retail, service, office, business park, research and development, light industrial, and industrial uses to provide employment opportunities and contribute to the Town's economic sustainability.	**Consistent.** The self-storage facility contributes to the industrial sector with low-trip generating, clean operations and is consistent with the economic hub vision for Yucca Valley.
Policy LU 1-16: Require high quality building design, property maintenance, amenities for pedestrian access, and adequate circulation, utilities, and infrastructure.	**Consistent.** The self-storage facility contributes to the industrial sector with low-trip generating, clean operations and is consistent with the economic hub vision for Yucca Valley.
Policy LU 1-17: Encourage the renovation of existing commercial and industrial areas to improve appearance, environmental responsiveness, use of infrastructure, and functionality.	**Consistent.** The project transforms an underutilized parcel into a well-designed, functional facility with upgraded utilities and roads.
Policy LU 1-18: Locate industrial uses near commercial uses when feasible to create synergy between the uses and established business nodes.	**Consistent.** Although not adjacent to commercial zones, the facility supports business operations needing offsite storage, indirectly supporting commercial functionality.
Policy LU 1-20: Focus commercial development along SR-62 to take advantage of infrastructure improvements.	**Consistent.** While not directly on SR-62, the site is within a nearby industrial area that complements the corridor by supporting non-retail uses that reduce traffic impacts.
Policy LU 1-22: Attract and retain nonpolluting, clean industrial development that expands the economic opportunities in the Town.	**Consistent.** The project is a clean, non-polluting facility with no hazardous operations.
Policy LU 1-23: Adequately buffer or otherwise ensure compatibility between commercial and industrial uses and residential areas (See also Policy LU 1-17).	**Consistent.** The site includes six-foot masonry walls and landscaping to buffer any adjacent uses, ensuring visual and operational compatibility.
Policy LU 1-24: Plan for the adequate and logical expansion of public facilities that are compatible with surrounding land uses, reflect community character, are educationally enriching, and meet a broad range of local needs.	**Consistent.** Utility extensions and road improvements are compatible with the surrounding land uses and support logical service expansion.

Goal / Policy	Consistency Analysis
Policy LU 1-26: Seek opportunities to collaborate with other public/quasi-public organizations in an effort to build new facilities to meet demand or develop joint use facilities.	**Consistent.** While the self-storage project is privately developed and does not directly involve shared public facilities, it supports local service needs (e.g., small businesses, transitional residential storage) and indirectly reduces demand on public space. Opportunities for collaboration—such as emergency access agreements with local fire services or shared utility infrastructure—can be explored during final project approvals to align with this policy.

4.12 Mineral Resources

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

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

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

No Impact

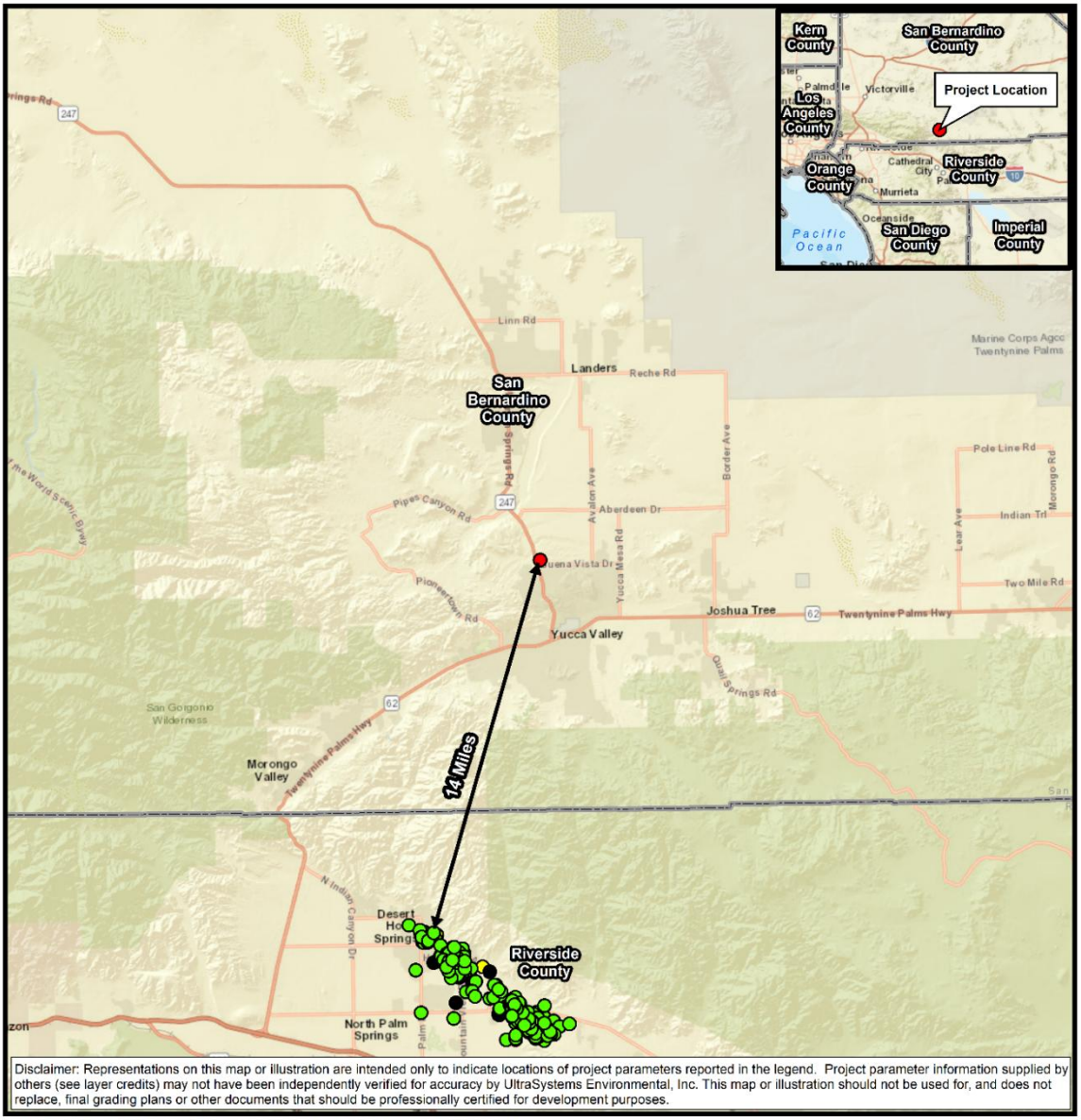
The proposed project site encompasses approximately 4.34 acres at the southeast corner of Newton Lane and Sun Mesa Drive in the Town of Yucca Valley (APN: 0597-111-67). The site has a General Plan Land Use Designation of Industrial and is zoned Industrial (I), which permits a range of employment and service-oriented uses, including light manufacturing, warehousing, and related activities. While this zoning supports industrial development, neither the Town of Yucca Valley's General Plan nor zoning regulations identify the site or surrounding parcels as designated for mineral resource extraction or conservation (Town of Yucca Valley, 2014).

According to the Mineral Land Classification of San Bernardino County by the California Geological Survey (CGS, 2020), the site is not located within a Mineral Resource Zone 2 (MRZ-2)—an area identified as containing regionally significant mineral deposits. The site is not designated within any SMARA-regulated mineral resource overlay, as defined under the California Surface Mining and Reclamation Act (SMARA; Public Resources Code §§ 2710–2796). Therefore, the project site is not subject to conservation requirements or mineral resource impact findings pursuant to CEQA Guidelines Appendix G or Public Resources Code § 21100(d).

Figure 4.12-1, Geothermal Wells, and **Figure 4.12-2, Oil and Gas Wells** indicate there are no active wells on or near the project site. The site is located in an industrial part of Yucca Valley and is not near any active mining operations, Aggregate Resource Areas, or Bureau of Land Management for designated mining claims. Chapter 5.11 of the San Bernardino Countywide Plan identifies mineral resource protection priorities primarily in unincorporated areas of the county where mining remains economically feasible. The subject property is outside those identified zones.

Development of the proposed self-storage facility, consistent with the site's Industrial zoning designation, would not obstruct or remove access to any known mineral resources of regional or statewide importance. Furthermore, the site is not identified as a locally important mineral resource recovery area in any local general plan, specific plan, or other land use plan. Therefore, the project would not result in the loss of availability of a significant mineral resource, and no impact would occur.

Figure 4.12-1
GEOTHERMAL WELLS



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_9_Geothermal_Wells_2025_07_18.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, December, 2017; UltraSystems Environmental, Inc., 2025.

July 18, 2025

Scale: 1:316,800

N

0 2.5 5 Miles

0 2.5 5 Kilometers

Legend

- Project Location
- County Boundary

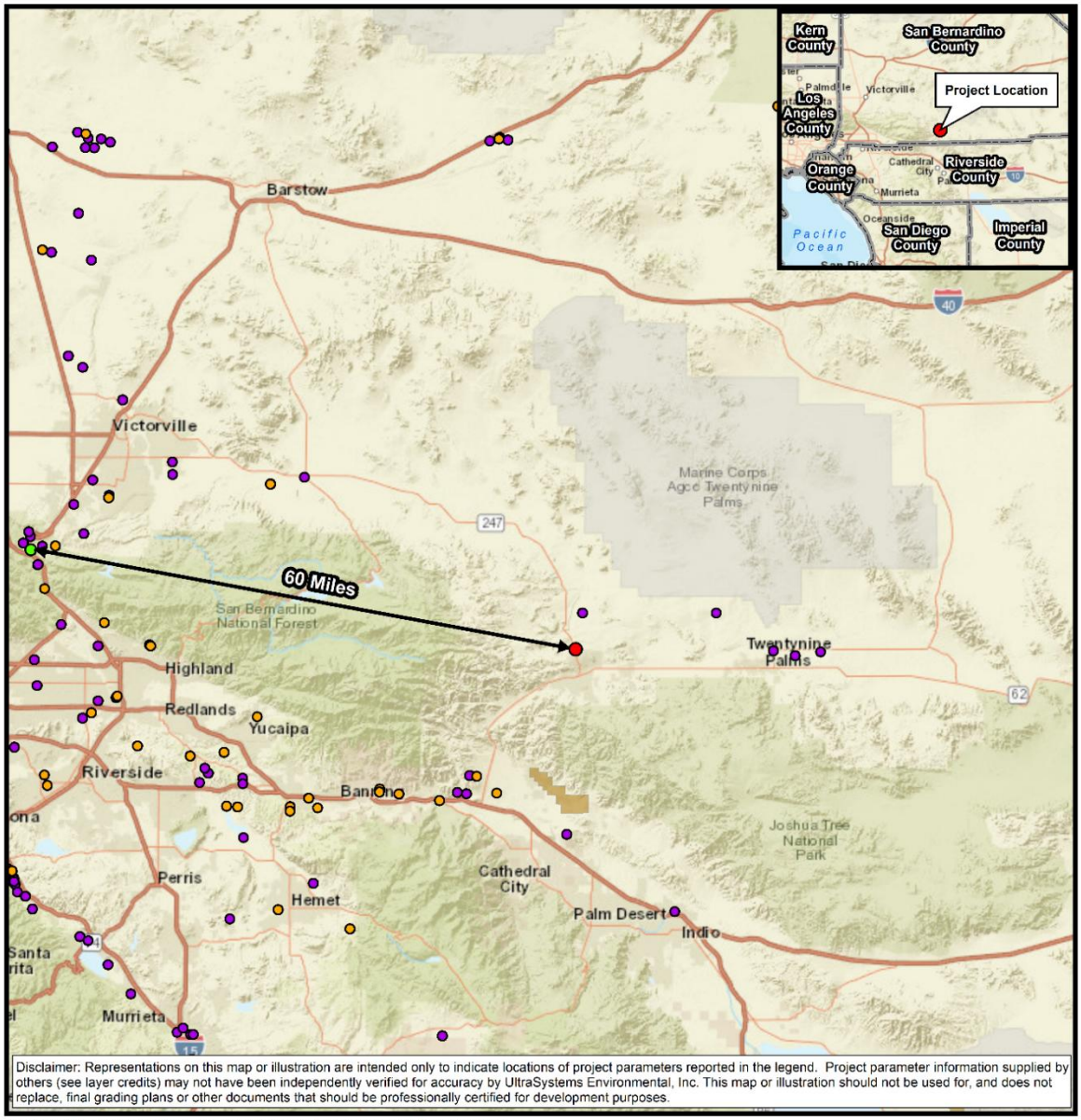
Geothermal Well Status:

- Active
- Cancelled
- Idle
- Plugged and Abandoned

Sun Mesa Self-Storage Facility
Geothermal Wells

UltraSystems environmental•management•planning

Figure 4.12-2
OIL AND GAS WELLS



Path: \\Gissvr\GIS\Projects\7335_SunMesa_SelfStorage\MXDs\7335_SunMesa_4_9_Oil_Gas_Wells_2025_07_18.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, December, 2017; UltraSystems Environmental, Inc., 2025.

July 18, 2025

Scale: 1:950,400

N

0 7.5 15 Miles

0 5 10 Kilometers

Legend

- Project Location
- Oil and Gas Field Boundary

Well Status

- Active
- Idle
- Plugged

Sun Mesa Self-Storage Facility
Oil and Gas Wells and Fields

UltraSystems environmental•management•planning

4.13 Noise

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

4.13.1 Characteristics of Sound

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in hertz or cycles per second), and duration (measured in seconds or minutes). The decibel (dB) scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Because the human ear is not equally sensitive to all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against upper and lower frequencies in a manner approximating the sensitivity of the human ear. The scale is based on a reference pressure level of 20 micro pascals (zero dBA). The scale ranges from zero (for the average least perceptible sound) to about 130 (for the average human pain level).

4.13.2 Noise Measurement Scales

Several rating scales have been developed to analyze adverse effects of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people depends largely upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq}, the equivalent noise level, is an average of sound level over a defined time period (such as 1 minute, 15 minutes, 1 hour or 24 hours). Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure.
- L_{90} is a noise level that is exceeded 90 percent of the time at a given location; it is often used as a measure of "background" noise.

- L_{max} is the root mean square (RMS) maximum noise level during the measurement interval. This measurement is calculated by taking the RMS of all peak noise levels within the sampling interval. L_{max} is distinct from the peak noise level, which only includes the single highest measurement within a measurement interval.
- CNEL, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 4.77-dBA "penalty" added to noise during the hours of 7:00 p.m. to 10:00 p.m., and a 10-dBA penalty added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime (Hendriks, 2013). The logarithmic effect of these additions is that a 60-dBA 24-hour L_{eq} would result in a calculation of 66.7 dBA CNEL.
- L_{dn}, the day-night average noise, is a 24-hour average L_{eq} with an additional 10-dBA "penalty" added to noise that occurs between 10:00 p.m. and 7:00 a.m. The L_{dn} metric yields values within 1 dBA of the CNEL metric. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent and are treated as such in this assessment.

4.13.3 Existing Noise

The following discussion is based largely on a memorandum prepared by LSA Associate Inc. (LSA), Noise and Vibration Impact Analysis for the Sun Mesa (Billings) Mini Storage Project, Yucca Valley, San Bernardino County, California (LSA, 2024a) included as **Appendix H**.

The primary existing noise sources in the project area are transportation facilities and industrial activities. Traffic on SR-247, Buena Vista Drive, Sun Mesa Drive, and Newton Lane contributes to the ambient noise levels in the project vicinity. Industrial uses are located immediately west and south of the project site. Existing land uses within the project area include single-family residences, vacant land, and industrial uses. Single-family residences are located southeast of the project site. Industrial uses are located south and west of the project site. Vacant land is located north and east of the project site.

LSA conducted two long-term (24-hour) noise level measurements from July 9 to July 10, 2024, and one long-term (24-hour) noise level measurement from July 10 to July 11, 2024, using Larson Davis Spark 706RC dosimeters to document the existing noise environment within the project area. Table G in the LSA technical report summarizes the results of the long-term noise level measurements along with a description of the measurement locations and noise sources that occurred during the measurements. As shown in Table G (**Appendix H,** page 9), daytime noise levels ranged from 40.7 to 63.1 dBA Leq and nighttime noise levels ranged from 43.1 to 53.5 dBA Leq. Also, the calculated CNEL levels at LT-1, LT-2, and LT-3 were 57.3, 57.7, and 57.9 dBA Leq, respectively.

4.13.4 Regulatory Setting

<u>State of California</u>

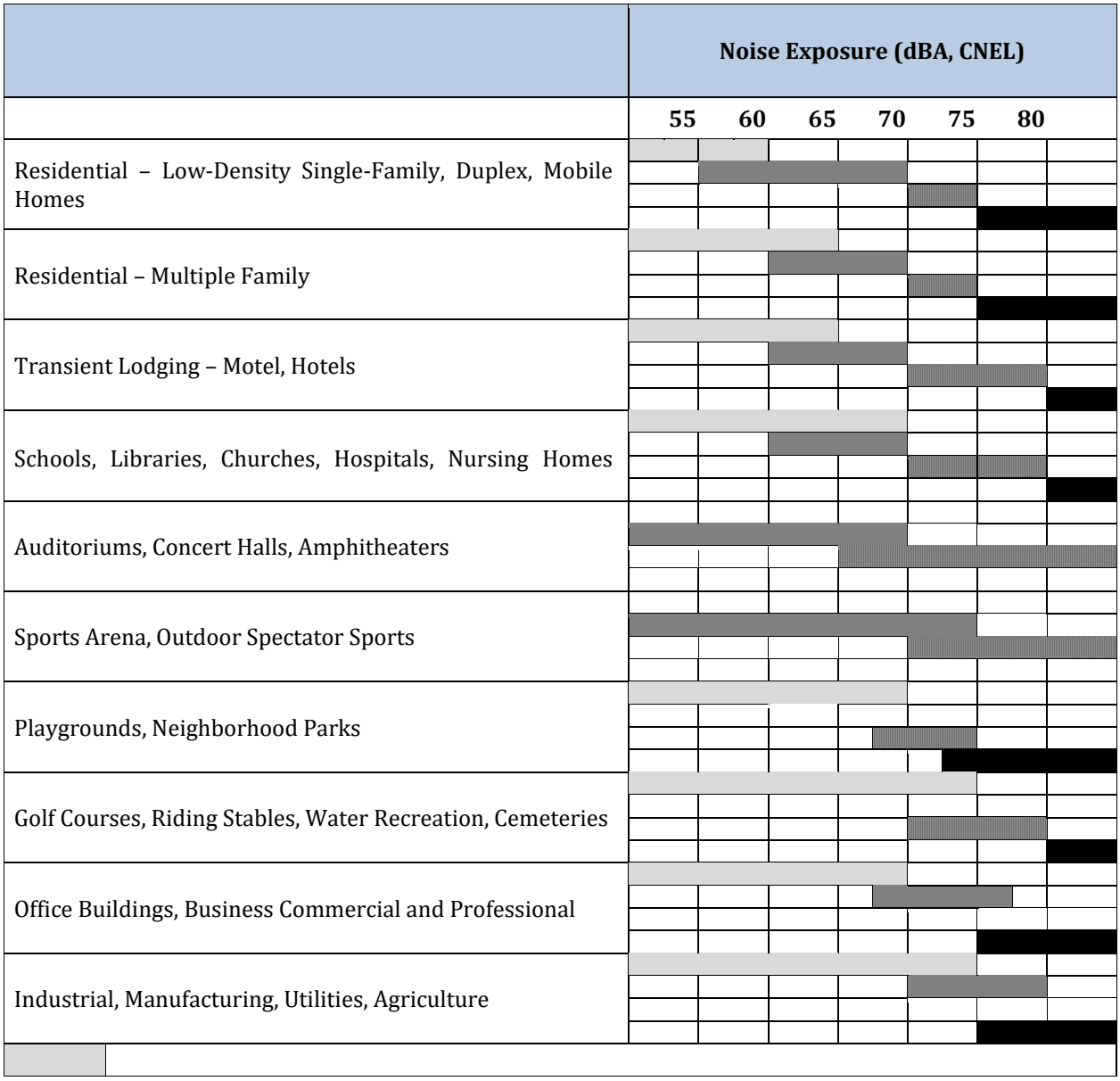
The California Department of Health Services (DHS) Office of Noise Control has studied the correlation of noise levels with effects on various land uses. (The Office of Noise Control no longer exists.) The most current guidelines prepared by the state noise officer are contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2003 and reissued in 2017 (Governor's Office of Planning and Research, 2017). These guidelines establish four categories for judging the severity of noise intrusion on specified land uses:

- **Normally Acceptable**: Is generally acceptable, with no mitigation necessary.

- **Conditionally Acceptable**: May require some mitigation, as established through a noise study.
- **Normally Unacceptable**: Requires substantial mitigation.
- **Clearly Unacceptable**: Probably cannot be mitigated to a less-than-significant level.

The types of land uses addressed by the state standards, and the acceptable noise categories for each, are presented in **Table 4.13-1**. There is some overlap between categories, which indicates that some judgment is required in determining the applicability of the numbers in a given situation.

Table 4.13-1
CALIFORNIA LAND USE COMPATIBILITY FOR COMMUNITY NOISE SOURCES



		Noise Exposure (dBA, CNEL)
	Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.	
	Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.	
	Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.	
	Clearly Unacceptable: New construction or development should generally not be undertaken.	

Source: Governor's Office of Planning and Research, 2017.

Town of Yucca Valley General Plan Noise Element

The Town's General Plan Noise Element (Town of Yucca Valley, 2014) has established policies to meet the Town's noise-related goal. The applicable policies for the proposed project are listed below.

Goal N1: A noise environment where excessive noise from stationary, transportation related, and temporary sources of noise are appropriately managed.

> **Policy N 1-3:** Require daytime only truck deliveries to commercial and industrial uses adjacent to residential uses and other sensitive receptors unless there is no feasible alternative.
>
> **Policy N 1-13:** Enforce Town noise standards and monitor compliance with noise standards.
>
> **Policy N 1-18:** Enforce standards on the hours of operation for nonemergency construction.

Town of Yucca Valley Municipal Code

Section 9.34.080(B) of the Town's Municipal Code establishes noise standards for stationary and mobile noise sources affecting adjacent properties. Table E shows the exterior noise standards for stationary noise sources, and Table F shows the exterior and interior noise standards for mobile noise sources.

4.13.5 Significance Thresholds

Two criteria were used for analyzing noise impacts. First, noise levels generated by the proposed project must comply with all applicable relevant federal, state, and local standards and regulations. Noise impacts on the surrounding community are limited by local noise ordinances, which are implemented through investigations in response to nuisance complaints. It is assumed that all existing regulations for the construction and operation of the proposed project will be enforced. In addition, the proposed project should not produce noise levels that are incompatible with adjacent noise-sensitive land uses.

The second measure of impact used in this analysis is a significant increase in noise levels above existing ambient noise levels as a result of the introduction of a new noise source. An increase in noise level due to a new noise source has a potential to adversely impact people. The proposed project would have a significant noise impact if it would:

- Expose persons to or generate noise levels in excess of standards prescribed by the Town of Yucca Valley Municipal Code.
- Include construction activities within the hours prohibited by the Municipal Code, without a permit.
- Expose nearby sensitive receivers to construction noise greater than the FTA 80 dBA threshold (FTA, 2018).
- Contribute, with other local construction projects, to a significant cumulative noise impact.
- Increase operational exposures at sensitive receivers (mainly because of an increase in traffic flow) by 5 dBA L_{eq} or more.

4.13.6 Impact Analysis

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

<u>Less than Significant Impact</u>

Noise impacts associated with storage facilities include short-term and long-term impacts. Construction activities, especially heavy equipment operation, would create noise effects on and adjacent to the construction site. Long-term noise impacts include project-generated onsite and offsite operational noise sources. Onsite (stationary) noise sources from the storage facility would include operation of mechanical equipment such as air conditioners, landscape and building maintenance. Offsite noise would be attributable to project-induced traffic, which would cause an incremental increase in noise levels within and near the project vicinity.

Construction

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and on-road delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. For the purpose of this

analysis, it was estimated that the proposed project would start in January 2026 and would take anywhere from six to eight months to complete the first two phases.

The types and numbers of pieces of equipment to be deployed during each construction phase were determined as part of the air quality and greenhouse gas emissions analyses for this project.[15] For each equipment type, **Table I** of the LSA technical report shows a summary of construction phase, equipment and noise levels for the project.

Using calculation methods published by the Federal Transit Administration (FTA 2018), LSA estimated the average hourly exposures at the nearest sensitive receiver for each construction subphase. The receivers evaluated included single-family residences along the north side of the project site and single-family houses along the southwest side of the project site. The distances used for the calculation were measured from the receivers to the approximate center of activity of each construction phase, since that would be the average location of construction equipment most of the time.

The closest residential property line is approximately 375 feet from the center of the project site and may be subject to short-term construction noise reaching 71.0 dBA L_{eq}. Construction noise is temporary and would stop once project construction is completed. Compliance with the Town's hours of construction pursuant to § 9.34.080(F)(3) of the Town's Municipal Code listed below would ensure construction-related noise would not be generated during the more sensitive nighttime hours. Furthermore, construction related noise levels would be below the FTA noise level standard of 80 dBA L_{eq} for residential uses.

Therefore, noise levels generated from project construction would be less than significant. No mitigation measures are required.

Operational Noise

<u>Onsite</u>

Onsite operational stationary noise would include parking activities and heating, ventilation, and air conditioning (HVAC) equipment. Noise generated from parking lot activities would include noise generated by vehicles traveling at slow speeds, engine start-up noise, car door slams, car horns, car alarms, and tire squeals (LSA, 2024a, pp. 13-14). Noise levels generated from project operations during daytime and nighttime hours at the closest residential property line would reach up to a combined stationary noise level of 38.2 and 35.4 dBA L_{eq}, respectively. Also, maximum noise levels generated from project operations during both daytime and nighttime hours at the closest residential property line would reach up to 51.5 dBA L_{max} (LSA, 2024a, p. 14). This maximum noise level would not exceed the Town's daytime and nighttime maximum noise standards of 55 dBA and 45 dBA for residential uses, respectively (LSA, 2024a, p. 7).

<u>Mobile Sources</u>

According to the *Sun Mesa Mini Storage Project Trip Generation and Vehicle Miles Traveled Memorandum* (LSA, 2024b) in **Appendix I**, the project is estimated to generate an average daily traffic (ADT) volume of 137. The existing ADT volume on SR-247 ranges between 2,950 and 11,837 according to the 2022 Caltrans Annual Average Daily Truck Traffic for Truck Traffic on California

[15] See **Section 4.3** and **Section 4.8**.

State Highways (Caltrans 2022). Also, the existing ADT volume on Buena Vista Drive is 3,643 based on the Yucca Valley General Plan Update Environmental Impact Report (Town of Yucca Valley, 2014). In addition, Sun Mesa Drive is a two-lane road similar to Buena Vista Drive and would experience a similar noise increase. It takes a doubling of traffic to increase traffic noise levels by 3 dBA, which represents the threshold change in noise level that is perceptible to the human ear. Based on the information above, project-related traffic on SR-247, Buena Vista Drive, and Sun Mesa Drive would increase traffic noise levels by up to 0.2 dBA. A noise level increase of less than 1 dBA would not be perceptible to the human ear. Therefore, no traffic noise impacts from project-related traffic on off-site sensitive receptors would occur. No mitigation measures are required.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact

Vibration is sound radiated through the ground. It can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the RMS velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in dB is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 vibration decibels (VdB). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

Table K in the LSA noise memorandum lists the projected vibration levels from various types of construction equipment expected to be used on the project site at the project construction boundary to the nearest buildings in the project vicinity. As shown in Table K, the residential and industrial buildings to the southeast and south of the project site are approximately 200 feet and 80 feet from the project construction boundary respectively and would experience a vibration level of up to 0.004 PPV (in/sec) and 0.016 PPV (in/sec), respectively. These vibration levels would not result in building

damage because residential and industrial buildings would be constructed equivalent to or better than nonengineered timber and masonry, and vibration levels would not exceed the FTA vibration damage threshold of 0.20 PPV (in/sec). Other building structures that surround the project site would experience lower vibration levels because they are located further away.

Operational Vibration

The proposed project would not generate operational vibration. In addition, vibration levels generated from project-related traffic on the roadways (SR-247, Buena Vista Drive, Sun Mesa Drive, and Newton Lane) leading to the project site are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Vibration generated from operations of the project would be minimal to negligible and would not exceed the Town's vibration standard of 0.2 in/sec. Therefore, vibration impacts from project-related operations would be less than significant. No mitigation measures are required.

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?

<u>No Impact</u>

The closest public airport to the project site is Yucca Valley Airport, which is 2.5 miles southeast of the project site. Based on the *Airport Comprehensive Land Use Plan for Yucca Valley Airport* (San Bernardino County 1992), the project site is well beyond the 60 dBA CNEL noise contour. Also, there are no private airstrips within two miles of the project site. Therefore, the project would not expose people working in the project vicinity to aviation-related excessive noise levels. Impacts would not be significant.

4.14 Population and Housing

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

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)?

No Impact

The proposed project entails the development of a self-storage facility consisting of approximately 541 storage units, a manager's office, parking areas, and associated landscaping on an approximately 4.34-acre site in the Town of Yucca Valley. The project does not include residential units or commercial uses that would accommodate a residential workforce. The staffing requirements are minimal and would not generate housing demand or population influx.

Additionally, although the project includes utility connections and limited road improvements (half-width improvements to Newton Lane), these upgrades are typical infrastructure improvements necessary to serve the proposed project and are not designed or sized to facilitate broader regional development. No new roadways or major infrastructure extensions beyond what is required for the project's internal circulation and direct access are proposed. Therefore, the project would not directly or indirectly induce substantial unplanned population growth and there is no impact.

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

No Impact

The proposed project site is currently vacant and does not contain any existing residential structures or occupied housing. As such, implementation of the proposed self-storage facility would not displace any residents or existing housing units. There would be no need for construction of replacement housing, no displacement-related impacts would occur, and there is no impact.

4.15 Public Services

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?				**X**
b) Police protection?				**X**
c) Schools?				**X**
d) Parks?				**X**
e) Other public facilities?				**X**

a) Fire protection?

<u>No Impact</u>

Public service impacts, including fire protection, are based on whether a project would increase the population in the area. The proposed storage facility, which does not include a residential element, would not increase the population in the area and would employ people living in the area. Therefore, there would be no impact.

b) Police protection?

<u>No Impact</u>

Public service impacts, including police protection, are based on whether a project would increase the population in the area. The proposed storage facility, which does not include a residential element, would not increase the population in the area and would likely employ people already in the area. Therefore, there would be no impact.

c) Schools?

<u>No Impact</u>

Public service impacts, including schools, are based on whether a project would increase the population. The proposed storage facility, which does not include a residential element, would not increase the population in the area and would employ people in the area. Therefore, there would be no impact.

d) Parks?

No Impact

Public service impacts, including parks, are based on whether a project would increase the population. The proposed storage facility, which does not include a residential element, would not increase the population in the area and would employ people in the area. Therefore, there would be no impact.

e) Other Public Facilities?

No Impact

Public service impacts, including libraries and hospitals, are based on whether a project would increase the population in the area. The proposed storage facility, which does not include a residential element, would not increase the population in the area and would employ people in the area. Therefore, there would be no impact.

4.16 Recreation

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

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact

Recreational services in the Town of Yucca Valley are provided by the Town's Department of Community Services, which maintains nine built parks and two open spaces (Town of Yucca Valley 2025a). The Town's Park acreage standard is three acres of public park land per 1,000 residents. The City currently has approximately 270 acres total in parks and land for public use, enough to meet this performance standard. Existing parks within approximately 3 to 5 linear miles of the project site include (Town of Yucca Valley 2014, 2025):

Community Center Park – approximately **2.8 miles south**

- About 10 acres.
- Includes open turf areas, walking/jogging paths, basketball courts, baseball field, and soccer field.
- Serves as a general community recreation area for passive and active uses.

Brehm Park – approximately **2.75 miles southwest**

- Community park (approx. 12 acres).
- Contains walking paths, open play areas, turf fields, and passive recreation amenities.
- Used by local residents for walking, running, and informal outdoor activities.

Paradise Park – approximately **3 miles southeast**

- Neighborhood park (~2–3 acres).
- Includes a playground, picnic areas, and at least one pickleball court.

- Serves nearby residential neighborhoods for children's play and small-scale recreational use.

North Park – approximately **4.5 miles southwest**

- Local community-serving park.
- Provides neighborhood-level open space and outdoor recreation opportunities.
- (No formal acreage or detailed amenity description available through public sources.)

Essig Park – approximately **4.6 miles south**

- Community park with playground areas, turf, seating/picnic space, and dog-friendly features.
- Recently improved with upgraded walkways, new shade structures, and irrigation enhancements.
- Serves families and local residents for passive recreation.

Demand for parks is generated by the population in the parks' service areas. The proposed project involves a self-storage facility, consisting of 16 detached storage structures, totaling approximately 89,700 square feet and a 400 square foot manager's office. The proposed project would not increase population in the parks' service areas and thus would not increase use of the parks. Therefore, there would be no impacts on parkland and park facilities.

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?

<u>No Impact</u>

The proposed project is on undeveloped land. Project development does not include recreation facilities and would not require the construction or expansion of existing recreational facilities. Therefore, there would be no impact.

4.17 Transportation

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

The following analysis is based upon the Trip Generation and Vehicle Miles Traveled (VMT) Analysis (LSA, 2024b) that was prepared following the San Bernardino County Transportation Impact Study Guidelines and the CEQA Guidelines (ref. **Appendix I**).

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

<u>Less than Significant Impact</u>

San Bernardino County Congestion Management Program (CMP)

The proposed project would not conflict with or result in inconsistencies with the San Bernardino County Congestion Management Program (CMP), administered by the San Bernardino County Transportation Authority (SBCTA). The CMP requires further evaluation for projects that generate more than 250 peak-hour trips, or that are expected to impact designated CMP facilities.

According to the Trip Generation Analysis prepared for the project, the project would generate approximately nine a.m. peak-hour and 15 p.m. peak-hour trips, for a total of 137 daily trips. These volumes fall well below the 250-trip CMP screening threshold (LSA, 2024b). Additionally, the project site is not located adjacent to or expected to generate measurable traffic on CMP-designated facilities, such as State Route 247 (SR-247) or State Route 62 (SR-62).

Therefore, based on its type and size, location, and trip generation, the project would not result in a significant impact to the regional transportation network and is considered to be exempt from CMP review requirements and no conflict with the CMP would occur.

San Bernardino County Active Transportation Plan

The proposed project would not conflict with the goals or policies of the San Bernardino County Active Transportation Plan, which promotes safe, connected infrastructure for pedestrians and

bicyclists throughout the County, including coordination with local jurisdictions such as the Town of Yucca Valley.

While no existing bicycle or pedestrian facilities are located along Newton Lane or Sun Mesa Drive adjacent to the project site, the Town of Yucca Valley General Plan Circulation Element identifies future Class II bicycle lanes along Buena Vista Drive, located south of the project area. The project would not obstruct or preclude these planned facilities and does not involve road widening or alterations that would degrade pedestrian or bicycle safety or connectivity.

Internally, the project includes sidewalks and pedestrian pathways to facilitate safe access between the parking areas and the manager's office, which aligns with the Active Transportation Plan's goal to support pedestrian accessibility within private developments. Because the project does not reduce or impair any existing or proposed regional active transportation routes and includes provisions for onsite pedestrian circulation, it is considered consistent with the SBCTA Active Transportation Plan. Therefore, no impact would occur with respect to regional active transportation policies.

San Bernardino Countywide Complete Streets Policy

The proposed project would not conflict with the San Bernardino Countywide Complete Streets Policy, adopted by the San Bernardino County Transportation Authority (SBCTA) to promote the design and development of transportation networks that safely accommodate all users, including motorists, pedestrians, bicyclists, and transit riders of all ages and abilities.

The project is located on Newton Lane in the Town of Yucca Valley, where existing pedestrian and bicycle infrastructure is currently limited as detailed above. However, the proposed project would not alter public rights-of-way in a manner that would preclude future multimodal improvements. It also includes internal pedestrian pathways consistent with the policy's emphasis on accessible internal circulation.

Although the project is not directly adjacent to any active transportation corridors, it would not obstruct planned infrastructure identified in the Town of Yucca Valley General Plan Circulation Element, including proposed Class II bicycle lanes along Buena Vista Drive. In addition, the project's scale and use are low traffic-generating and do not introduce safety conflicts for non-motorized users.

The project supports the intent of the SBCTA Complete Streets Policy by maintaining flexibility for future multimodal enhancements and providing safe internal pedestrian access. Therefore, the project is considered consistent with the Countywide Complete Streets Policy, and no impact would occur.

Town of Yucca Valley General Plan – Mobility and Transportation

As previously mentioned, the project is expected to generate approximately 137 daily vehicle trips, including nine a.m. peak-hour trips and 15 p.m. peak-hour trips. These volumes fall well below San Bernardino County's threshold of 100 peak-hour trips, which would otherwise necessitate a full Transportation Impact Study (TIS). Further, the proposed project does not include a zone change or a General Plan amendment. As such, the project would not result in a substantial increase in vehicle traffic or roadway congestion and is consistent with applicable circulation policies outlined in the Town of Yucca Valley General Plan Circulation Element (Town of Yucca Valley, 2014).

Table 4.17 below provides a detailed validation of the project's consistency with the Mobility and Transportation goals and policies outlined in the Town of Yucca Valley General Plan.

Table 4.17-1
COMPLIANCE WITH YUCCA VALLEY GENERAL PLAN – CIRCULATION ELEMENT

Goal / Policy	Consistency Analysis
GOAL C 1: A constraints-based circulation system that balances the needs of goods movement, nonautomotive use, and complete streets.	
Roadway Classification Policies	
Policy C 1-1 Utilize a constraints-based planning process to evaluate future transportation improvements.	*Consistent.* Project adheres to local street constraints and does not require capacity beyond typical industrial use; improvements along Newton Lane and Sun Mesa Drive reflect localized constraints-based planning.
Policy C 1-2 Pursue funding, including updating the transportation impact mitigation fee program, to assist in implementing the transportation system by expanding its roadway capacity, pedestrian sidewalk facilities, bicycle facilities, and trail facilities.	*Consistent.* Offsite improvements are proposed; development impact fees and future Town updates to the fee program will assist in network-wide transportation funding.
Policy C 1-3 Strive to maintain vehicle level of service (LOS) D on all roadways within the Town. Utilize the roadway capacities, as identified in Table C-1, to evaluate roadway operations.	*Consistent.* Project generates minimal traffic and would not degrade LOS below D. If a transportation study is prepared, LOS D compliance will be verified against Table C-1 capacities.
Policy C 1-6 Protect rights-of-way for SR-62 and SR-247, major arterials, collectors, residential streets, and for all other planned infrastructure as shown on the figures above.	*Consistent.* Improvements respect existing ROW on Newton Lane and Sun Mesa Drive; the project does not encroach on SR-62/SR-247 alignments.
Policy C 1-7 Encourage development designs that integrate multiple modes of access, including pedestrian, bicycle, and public transportation.	*Consistent.* The project includes internal pedestrian paths, ADA access, and driveways wide enough for service vehicles, integrating multimodal access on-site.
Complete Streets Policies	
Policy C 1-8 Apply complete street strategies that accommodate pedestrian, bicycle, and transit.	*Consistent.* While not a typical complete streets project, the facility integrates sidewalks and ADA features, promoting internal pedestrian safety.
Policy C 1-9 Require sidewalk improvements concurrent with new development where commercial and school uses are planned and where residential densities exceed two units per acre, or as required by the Planning Commission.	*Consistent.* Sidewalks are proposed along Newton Lane and Sun Mesa Drive consistent with Town requirements.
Efficient Goods and Services Movement Policies	
Policy C 1-15 Design designated truck routes such that the pavement, roadway width, and curb return radii support anticipated heavy vehicle use.	*Consistent.* Driveways and internal circulation lanes are designed to accommodate moving trucks and delivery vehicles, consistent with industrial roadway geometry.
Policy C 1-16 Support and work with Caltrans to coordinate signals along SR-62 and SR-247 in Town.	*Consistent.* While the project does not front SR-62/SR-247, its location and access points support the local freight network, especially with paved improvements and loading zones.
Policy C 1-17 Ensure funding is available to implement and maintain signal coordination.	

Policy C 1-18 Maintain truck route designations to support heavy vehicle use and connections to the Yucca Valley Airport as noted on Figure C-3.	
Traffic Management Policies	
Policy C 1-20 Require future development to pave roadways that will serve 500 or more daily trips as noted in Table C-1 unless paving of that facility is considered infeasible by the Town, there is no funding for the improvement, or when the majority of the residents on that facility desire it to be unpaved.	*Consistent.* Project proposes paving of Newton Lane and Sun Mesa Drive, supporting this policy's directive for roads serving 500+ ADT.
Policy C 1-21 Pursue funding to pave unpaved roadways where the traffic volume exceeds 500 daily trips unless paving of that facility is infeasible or when the majority of the residents on that facility desire it to be unpaved.	*Consistent. Dust control will be implemented during construction; paved access will reduce future dust emissions and aligns with the Town's dust minimization goals.*
Policy C 1-22 Minimize dust emissions on existing and new unpaved roads where traffic volumes exceed 500 daily trips.	
Policy C 1-25 Maintain truck routes through town for efficient freight transportation service to businesses and industry while limiting impacts to residents and visitors.	*Consistent.* Project supports local freight and delivery needs without impacting residential zones, thus maintaining appropriate use of designated truck routes.
GOAL C 2: A full range of public utilities and related services that provide for the immediate and long-term needs of the community.	
Policies	
Policy C 2-1 Work with utility providers in the planning, designing, and siting of distribution and support facilities to comply with the standards of the General Plan and Development Code.	*Consistent.* Utility coordination with High Desert Water District, SCE, and septic provider has been incorporated into project planning.
Policy C 2-2 Work with utility providers to increase service capacity as demand increases.	*Consistent.* The project's infrastructure extensions support capacity growth; future service expansions can accommodate increased demand in the industrial area.
Policy C 2-3 Coordinate public infrastructure improvements through the Town's Capital Improvement Program.	*Consistent.* Project improvements are consistent with Town capital improvement priorities and will be subject to coordination during final approvals.
Policy C 2-4 Encourage the shared use of right-of-way, transmission corridors, and other appropriate measures to minimize the visual impact of utilities infrastructure throughout Town.	*Consistent.* Utility connections will use existing corridors. Visual impacts are minimized via undergrounding and site screening.
Policy C 2-5 Require that approval of new development be contingent upon the project's ability to secure appropriate infrastructure services.	*Consistent.* No development approval will be granted without full confirmation of water, electricity, and septic availability and feasibility.

Bicycle and Pedestrian Circulation

There are currently no existing bicycle lanes or continuous sidewalk facilities adjacent to the project site. In addition, the project would not interfere with any proposed bicycle infrastructure outlined in the Town of Yucca Valley General Plan Circulation Element, including future Class II bike lanes along Buena Vista Drive, located south of the project site. Pedestrian infrastructure in the area is limited,

and the project would not result in the removal or obstruction of any sidewalks or pedestrian pathways.

Public Transit

The nearest fixed-route transit service in the vicinity is provided by Basin Transit (formerly Morongo Basin Transit Authority). The closest stop is located at the Yucca Valley Transit Center, situated at Yucca Trail & Airway Road, which is part of Basin Transit's Route 21 -Landers–Yucca Valley loop. This transit center is approximately two miles west of the project site at Newton Lane and Sun Mesa Drive, confirming that no fixed-route stops are located along Newton Lane or Sun Mesa Drive, and the project site lies outside of immediate transit coverage (Basin Transit, 2025). The project would not alter or conflict with Basin Transit service routes or schedules, and no transit stop improvements are proposed or required.

As detailed above, the proposed project would not conflict with any applicable policies from the town's General Plan addressing circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, the project would have a less than significant impact in this regard.

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

Less Than Significant Impact

Under the 2025 CEQA Guidelines §15064.3(b), vehicle miles traveled (VMT) is the required metric for determining transportation impacts as the basis for significance under CEQA. A Trip Generation and VMT Analysis was prepared for the proposed project by LSA Associates, Inc. (LSA, 2024b). included as **Appendix I**, consistent with the San Bernardino County Transportation Impact Study Guidelines and SBCTA screening protocols.

Based on the analysis, the project is located in a low-VMT zone, defined as a traffic analysis zone (TAZ) where baseline VMT is at least four percent below the County average. The San Bernardino County average VMT per worker is 16.9, while the proposed project's TAZ has a VMT of 9.6 per worker, which is 43.19 percent below the County average and detailed in **Table 4.17-2**. Therefore, the project qualifies for screening and is presumed to result in a less than significant impact, unless there is pertinent information to the contrary.

Table 4.17-2
PROJECT VMT ANALYSIS

Metric	County Threshold	Project Value	Difference	Significance
VMT per worker (County average)	16.9	9.6	–43.19 percent	Less than significant
Screening threshold (low-VMT zone)	≥4 percent below average	Yes	Met	No detailed analysis required

Source: LSA Associates, 2024

Because the project falls below both the screening threshold and trip generation thresholds and is located within a low-VMT zone, it is exempt from detailed VMT modeling and would not conflict with CEQA Guidelines §15064.3(b). Therefore, the project would have a less than significant impact.

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

Less than Significant Impact

The proposed project includes two standard 30-foot-wide driveways along Newton Lane, which provide adequate access for vehicles, including emergency responders, in accordance with the Town of Yucca Valley development standards and California Fire Code access requirements. Internal drive aisles range from 15 to 30 feet in width, sufficient to accommodate typical passenger vehicles and service trucks associated with self-storage operations. The site plan will be reviewed for compliance with applicable geometric design standards, and no unusual roadway features—such as sharp curves, blind intersections, or non-standard turning radii—are proposed.

The proposed self-storage facility is consistent with the site's Industrial zoning and would not introduce an incompatible use, such as agricultural or heavy industrial operations requiring farm equipment or off-road vehicles. No hazardous design elements or incompatible land use conflicts have been identified. Therefore, the project would not result in hazardous conditions due to design features or surrounding uses, and a **less than significant** impact would occur.

d) Would the project result in inadequate emergency access?

Less than Significant Impact

Construction

The project would not result in inadequate emergency access during construction. All construction activities, including grading, utility installation, and building erection, would be confined to the 4.34-acre project site with the exception of half-roadway improvements along Newton Lane and Sun Mesa Drive. Temporary barricades and perimeter fencing would be installed for safety, but access points along Newton Lane would remain unobstructed for emergency vehicles. Construction staging and worker parking would occur entirely on-site, ensuring that public roads remain clear. Compliance with the California Fire Code and coordination with the San Bernardino County Fire Protection District will be required to ensure that emergency access routes are maintained throughout all construction phases. Therefore, a **less than significant** to emergency access during construction would occur.

Operation

During project operation, emergency access would be fully accommodated via two 30-foot-wide driveways off Newton Lane, which exceed minimum width requirements for emergency vehicle ingress and egress. Internal circulation lanes range from 15 to 30 feet wide, which allows sufficient turning radii and maneuverability for fire apparatus and emergency responders. The site will also feature rolling security gates at driveway entrances that are designed to be accessible to first responders per Fire District specifications. The project's design and circulation layout have been or will be reviewed by the San Bernardino County Fire Protection District during the permitting process to ensure full compliance with emergency access standards. Therefore, a **less than significant** to emergency access during operation would occur.

4.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?				X
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?		X		

Information from the LSA Phase I Cultural Resources Assessment Report, dated August 2025 for the proposed project (refer to **Appendix D**) is included in the analysis below.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?

No Impact

No resources as defined by Public Resources Code §21074 have been identified. Additionally, the project site has not been recommended for historic designation for prehistoric and Tribal Cultural Resources (TCRs). No tribal cultural sites were documented in the Native American Heritage Commission's Sacred Lands File (SLF) search. No specific tribal resources have been identified.

No prehistoric or historic archaeological resources were observed during the field survey conducted on July 20, 2024, by LSA Archaeologist Cassidy Sharp as part of the cultural resources investigation (**Appendix D**).

Based on the SCCIC cultural resources records search on July 11, 2024, it was determined that there are no prehistoric or historic cultural resources previously recorded within the project site boundary. Within the one-mile buffer zone, there have been three recorded resources, one of them prehistoric and two historic-era. The single prehistoric site within the one-mile buffer of the project boundary is a lithic artifact scatter (36-002379). This artifact scatter is located approximately 0.29 mile southwest of the project site. The two historic period resources include a 1950s residence at 4451 Old Woman Springs Road (36-027695) and a segment of Old Woman Springs Road (36-010716), a route dating to the 19th century that is located approximately 160 meters/530 feet to the

west. There have been 16 previous cultural resource studies within the one-mile buffer of the project. None of these surveys intersects the current project boundary. (**Appendix D** to this IS/MND).

No tribal cultural resources onsite are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code § 5020.1(k). Therefore, the project would have no impact in this regard.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?

Less than Significant Impact with Mitigation Incorporated

Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American Tribes on potential impacts on TCRs, as defined in Public Resources Code § 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (CNRA, 2007).

As part of the AB 52 process, Native American tribes must submit a written request to the lead agency to be notified of projects within their traditionally and culturally affiliated area. The lead agency must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receiving this notification if they want to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The Town of Yucca Valley (the lead agency) is conducting AB 52 outreach with local tribes for the Sun Mesa Mini Storage Project. The Lead Agency has prepared and sent letters via certified mail and emails on April 4, 2024 and again on July 30, 2025 with the corrected project number to the several tribes on the City's list for AB 52 contact, and to the Agua Caliente Band of Cahuilla Indians on October 8, 2025 informing them of the project. The letters convey that the recipient has 30 days from the receipt of the letter to request AB 52 consultation regarding the project.

The tribes contacted included:

- Lacy Padilla, Director of Historic Preservation/THPO, Agua Caliente Band of Cahuilla Indians
- Ann Brierty, THPO, Morongo Band of Mission Indians
- Robert Martin, Chairperson, Morongo Band of Mission Indians
- Jill McCormick, Historic Preservation Officer, Quechan Tribe of the Fort Yuma Reservation
- Vanessa Minott, Tribal Administrator Santa Rosa Band of Cahuilla Indians
- Mark Cochrane, Co-Chairperson, Serrano Nation of Mission Indians
- Wayne Walker, Co-Chairperson, Serrano Nation of Mission Indians
- Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseno Indians

- Manfred Scott, Acting Chairman - Kw'ts'an Cultural Committee; Quechan Tribe of the Fort Yuma Reservation
- Jordan Joaquin, President, Quechan Tribal Council; Quechan Tribe of the Fort Yuma Reservation
- Alexandra McCleary, Senior Manager of Cultural Resources Management, San Manuel Band of Mission Indians
- Steven Estrada, Tribal Chairman, Santa Rosa Band of Cahuilla Indians
- Jessica Valdez, Cultural Resource Specialist Soboba Band of Luiseno Indians
- Nicolas Garza, Cultural Resources Specialist, Twenty-Nine Palms Band of Mission Indians
- Sarah O'Brien, Tribal Archivist Twenty-Nine Palms Band of Mission Indians
- Christopher Nicosia, Cultural Resources Manager/THPO Manager Twenty-Nine Palms Band of Mission Indians

The Twenty-Nine Palms Band of Mission Indians responded by email to Jared Jerome, Town of Yucca Valley Associate Planner, on September 15, 2025 with a letter attached dated September 12, 2025. The letter from Chairman Darrell Mike indicated that the project is within the Chemehuevi Traditional Use Area but no known cultural resources are located within the project's APE but there exists the possibility of surface or buried materials on the site. Chairman Mike asked that the Lead Agency follow specific conditions for all cultural resources on any development plans and indicated that Mr. Nicolas Garza, Tribal Historic Preservation Officer can be contacted for further consultation. Mr. Jerome responded on September 15, 2025 with a question about a potential missing sentence and providing projects documents including the Cultural Resources Assessment. Mr. Jerome also asked if Mr. Garza would like to have a meeting or if there are specific mitigation measures or conditions you would like to be included with the project. No further response has been received from Twenty-Nine Palms Band of Mission Indians.

The Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) responded by email on April 12, 2024 . Ms. Kristine Tuosto, Tribal Archaeologist, requested the following for review: Cultural report, Geotechnical report, project plans showing the depth of proposed disturbance. This information will assist Yuhaaviatam of San Manuel Nation in ascertaining how the Tribe will assume consulting party status under CEQA. Ms. Tuosto sent a second request for this information on July 12, 2024. Mr. Jerome responded on July 22, 2025 that these studies are still being prepared and should be completed between August and October. Ms. Raylene Borrego, Cultural Resources Technician contacted Mr. Jerome through email on December 2, 2024 asking about the update on the required studies. Mr. Jerome responded that all of the technical studies have not been completed but that the grading plan and Cultural study was completed and those were provided. Ms. Borrego responded on December 2, 2024 indicating that after reviewing the cultural report and with their knowledge of the area the tribe has determined the project may have potential for inadvertent discoveries of Tribal Cultural Resources and requests that a series of Cultural and Tribal Mitigation Measures provided be made part of the project's mitigation measures. These Tribal Cultural Resources measures are included in the Mitigation Measures for this project as **MM TCR-1** and **MM TCR-2**.

The Morongo Band of Mission Indians responded by email to Mr. Jerome on May 8, 2024. Ms. Bernadette Ann Brierty, Tribal Historic Preservation Officer, indicated that the Project is located within the ancestral territory and traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians and requested government-to-government consultation with the Town of Yucca Valley. The tribe indicated that tribal monitoring is recommended during the cultural resource surveys and future construction phases of the Project. The tribe requests a California

Historical Resources Information System (CHRIS) records search conducted with at least a 1.0-mile search radius from the project boundary, tribal participation (a.k.a. tribal monitors) during the pedestrian survey and testing and copies of the Phase I study if this work has taken place, shape files of the Project's area of effect, Geotechnical Report, and current Project design and Mass Grading Maps. Mr. Jerome responded by email on September 18, 2025 with much of the requested materials except the shapefiles as they don't have that for the proposed project. Mr. Jerome also asked if the tribe had any questions, would like to have a meeting or would like to add specific conditions of approval for the project to please contact him. Mr. Jerome responded by email on November 5, 2025 asking if the tribe is interested in consulting on this project and asked for dates and times for a meeting if preferred. No response has been received.

The Agua Caliente Band of Cahuilla Indians responded by email on October 10, 2025 indicating that the project area is not located within the boundaries of the ACBCI Reservation, but it is within the Tribe's Traditional Use Area, Due to this, the Tribe requests consultation on this project. In a follow up letter received November 3, 2025, Anthony Kline, Cultural Resources Analyst indicated that for this project a Cultural Resource Monitor(s) from a Consulting tribe should be onsite during all ground disturbing activities, including testing and surveys and can request that construction halt if resources are encountered. The tribe also requested that the archaeologist on site must meet the Secretary of Interior's standards. The last request from the tribe is that if any Tribal Cultural Material is found, in collaboration with Agua Caliente, it be reburied on site if avoidance is not feasible. The tribe also asked to review San Manuel's Mitigation measure and that it no other consultation tribe requests monitoring to please contact Agua Caliente to provide that service. The Mitigation Measures from the San Manuel Band of Indians was provided to the tribe on November 3, 2025. Mr. Jerome provided the TCR section for review and the tribe provided two comments.

Given the local Native American tribal concerns for potential traditional cultural resources, mitigation measures provided by the Yuhaaviatam of San Manuel Nation will be implemented to further reduce potential impacts to less than significant levels. At the request of the Morongo Band of Mission Indians a Mitigation Measure for Tribal Monitoring will be included. Consultation has been concluded for this project as of November 17, 2025.

Construction activities associated with development of the project would involve new subsurface disturbance and could result in the unanticipated discovery of cultural resources, with the implementation of mitigation measure **MM TCR-1** and **MM TCR-3** this impact would be less than significant. In the unlikely event of an unexpected discovery of human remains, **MM TCR-2** would ensure that impacts related to the accidental discovery of human remains would be less than significant.

Mitigation Measures

MM TCR-1: **Treatment of Cultural Resources During Project Implementation**. If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.

The Secretary of the Interior Qualified Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from the Consulting Tribes (Yuhaaviatam of San Manuel Nation (YSMN), Morongo Band of Mission

Indians (Morongo), and the Agua Caliente Band of Cahuilla Indians), the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribes, unless otherwise decided by YSMN and Morongo. All plans for analysis shall be reviewed and approved by the applicant and YSMN and Morongo prior to implementation, and all removed material shall be temporarily curated on-site.

It is the preference of the Consulting Tribes, that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by The Consulting Tribes, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and the Consulting Tribes. All reburials are subject to a reburial agreement that shall be developed between the landowner, and Consulting Tribes outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts.

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with the Consulting Tribes to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and the Consulting Tribes for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and the Consulting Tribes.

MM TCR-2: **Inadvertent Discoveries of Human Remains.** If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

MM TCR-3: **Tribal Cultural Resources Monitoring.** In consultation with Consulting tribes (San Manuel and Morongo. If they are unable to provide a monitor, Agua Caliente can provide one), the developer, and the Town of Yucca Valley, a Tribal Monitoring Plan (TMP) will be prepared to address the details, timing, and responsibility Tribal Monitoring activities that will occur on the project site. Details in the TMP shall include:

1. Monitoring of project-related ground disturbance (including, but not limited to, brush clearing, grading, trenching, archaeological testing, surveys, etc.) coordinated with these construction-related activities.

2. The development of a concurrent monitoring schedule in coordination with the developer and the designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with the project archaeologist.

3. The protocols and stipulations that the developer, City, Tribes, and project archaeologist will follow in the event of inadvertent TCR discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

Level of Significance After Mitigation

With implementation of Mitigation Measure **MM TCR-1** and **MM TCR-3,** potential project impacts on TCRs would be less than significant. With implementation of **MM TCR-2** above, the proposed project would result in less than significant impacts to human remains and associated funerary objects.

4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of whi1ch could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

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

<u>Less than Significant Impact</u>

As discussed in **Section 3.0** the proposed project would require offsite improvements including sewer, domestic water, fire water, irrigation, and dry utilities connections to existing utility infrastructure in Newton Lane.

Wastewater Treatment and Conveyance – The proposed project includes construction of a septic tank and leach field, as the site is outside the service area of a wastewater treatment plant. The project

includes construction of wastewater lines within the project site discharging to the septic tank but would not involve connections to offsite sewers.

The proposed septic tank would have 750 gallons capacity. The project includes one proposed restroom, in the manager's office, that would contain one sink and one toilet. The septic tank would have adequate capacity for estimated project wastewater generation per the percolation testing report completed for the project by Sladden Engineering included as **Appendix G1** (Sladden, 2025b, p. 4).

Hi-Desert Water District (HDWD) is building a sewer system serving much of the town of Yucca Valley. However, the project site is outside the sewer system service area (HDWD, 2020, Figure 3A).

Domestic Water – The project site is in the HDWD service area. HDWD water supplies consist of local groundwater from the Warren Valley Groundwater Basin underlying the southern part of HDWD's service area, and the Ames Valley Groundwater Basin underlying the northern part of HDWD's service area (HDWD, 2021, p. 3-2). As analyzed below in Threshold 4.19 b), the project would result in a nominal increase in water demand and therefore, the project would have a less than significant impact regarding domestic water supplies.

Water Treatment – HDWD water supplies meet state and federal water quality standards and does not require treatment before delivery to customers (HDWD, 2021, p. 3-14).

Stormwater – Existing storm drainage onsite is via surface flow to the southwest. The project includes construction of an infiltration basin in the southwest corner of the project site that would have design capture volume of 13,243 cubic feet (DRP, 2024b). The proposed infiltration basin would meet San Bernardino County requirements for site drainage, and project impacts on stormwater drainage systems would be less than significant.

Electric Power: Electric power for the City of Yucca Valley is provided by Southern California Edison (SCE) (CEC, 2023). The proposed project is in a developed area, and infrastructure for providing electric power to the area is well established. SCE typically utilizes existing utility corridors to reduce environmental impacts and has energy-efficiency programs to reduce energy usage and maintain reliable service throughout the year (Southern California Edison, 2025. Total electricity consumption in SCE's service area is forecast to be 111,672GWh[16] in 2022 and 122,931 GWh in 2030 (CEC, 2020, Form 1.2).

The project would be constructed in accordance with applicable Title 24 regulations and would not necessitate the construction or relocation of electric power facilities. Therefore, a less than significant impact would occur.

Natural Gas: The proposed development would be all-electric, and no gas service would be provided to the project. No impacts on natural gas supplies or natural gas distribution infrastructure would occur.

Telecommunications Facilities: Frontier Communications provides telecommunications services near the project site (digalert.com, 2025). It is expected that Frontier facilities would be extended to the project site from existing lines in adjacent roadways. The proposed project would not interfere

[16] One GWH is equivalent to one million kilowatt-hours.

with the operation of telecommunications facilities, and therefore a less than significant impact would occur.

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

Less than Significant Impact

Water Supplies and Demands

The Hi Desert Water District (HDWD) provides water to part of the town of Yucca Valley including the project site. HDWD water supplies consist of groundwater from two local groundwater basins, Warren Valley and Ames Valley. HDWD forecasts that it will have sufficient water supplies to meet demands in normal water year, single-dry-year, and multiple-dry-year conditions over the 2020-2040 period (HDWD, 2021, p. 5-2).

Table 4.19-1
HDWD RETAIL WATER SUPPLIES AND DEMANDS, AFY

	2025	2030	2035	2040	2045
Supplies	3,056	3,149	3,222	3,292	3,354
Demands	3,056	3,149	3,222	3,292	3,354
Difference	0	0	0	0	0

Source: HDWD, 2021, p. 5-2
AFY= Acre-Feet per Year

Self-storage businesses are estimated to use 25 gallons per day (gpd) of water per 1,000 square feet of building area (City of Los Angeles, 2006).[17] The proposed project includes development of 89,700 square feet of building area; thus, project water demand is estimated at about 2,243 gpd. HDWD demand forecasts are based on a population projection by the UC Riverside School of Business Center for Economic Forecasting and Development in 2020. The demand forecasting model includes economic indicators such as residential housing stock, home prices, and employment trends (HDWD, 2021, p. 2-6). The self-storage business is accounted for in HDWD's demand forecast. Therefore, impacts under this category are anticipated to be less than significant.

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

No Impact

The proposed project includes installation and operation of a septic tank and leach field for wastewater disposal and treatment. The project site is outside of the service area of the sewer system that is under construction in the town of Yucca Valley. Project wastewater generation would have no impact on the treatment capacity of a wastewater treatment provider, and no impact would occur.

[17] The water demand factor is 125percent of the wastewater generation factor for self-storage uses from the City of Los Angeles (City of Los Angeles, 2006).

d) Would the project 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 Impact

The city contracts with Burrtec Waste & Recycling, Inc., for collection and disposal of the city's solid waste (Yucca Valley, 2025). Solid waste is disposed of at the Landers Sanitary Landfill (CalRecycle, 2025a), which is described below in **Table 4.19-2**.

Table 4.19-2
LANDFILLS SERVING YUCCA VALLEY

Facility and Nearest City/Community	Remaining Capacity, cubic yards	Daily Permitted Disposal Capacity, tons	Actual Daily Disposal, tons[1]	Residual Daily Disposal Capacity, tons	Estimated Closing Date
Landers Sanitary Landfill	11,063,811	1,200	202	998	2072

[1] Daily disposal calculated based on annual disposal tonnage assuming 300 operating days per year: that is, six days per week less certain holidays.
Sources: CalRecycle. 2025b.

Construction

Project construction would generate solid waste requiring disposal at local landfills. Materials generated during construction of the project may include paper, cardboard, metal, plastics, glass, concrete and other materials. Section 5.408 of the 2022 California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse (DGS, 2025). Project construction would include recycling and/or salvaging at least 65 percent of construction and demolition waste in accordance with the 2022 CALGreen.

Operation

No solid waste generation factor for self-storage uses is available. The solid waste generation factor for commercial uses, 0.006 pounds per day (ppd) per square foot, is for purposes of this analysis (CalRecycle, 2025c). The 89,700-square-foot project is thus estimated to generate about 538 pounds of solid waste per day (this is a conservative estimate). Adequate capacity is available at the Landers Sanitary Landfill for project-generated solid waste. Impacts would therefore, be less than significant.

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

Less Than Significant Impact

In 1989, the California Legislature enacted the California Integrated Waste Management Act (AB 939), to address solid waste problems and capacities in a comprehensive manner. The law required each city and county to divert 50 percent of its waste from landfills by the year 2000. San Bernardino County developed a Source Reduction and Recycling Element in 1994 that aims at recycling, composting, special waste disposal, and education and public information programs.

Assembly Bill 341 (AB 341; Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for commercial and multi-family residential land uses. The project would include storage areas for recyclable materials in accordance with AB 341.

Assembly Bill 1826 (AB 1826; California Public Resources Code Sections 42649.8 et seq.) requires recycling of organic matter by businesses, and multifamily residences of five or more units, generating such wastes in amounts over certain thresholds. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. The project does not include food preparation facilities or spaces dedicated to food storage. The project includes limited landscaping along the north and west site boundaries. The project would include organics cans for storage of landscaping waste in accordance with AB 1826. The proposed project would comply with applicable local, state and federal solid waste disposal standards; therefore, impacts would be less than significant.

4.20 Wildfire

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

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact

The proposed project is located within the Town of Yucca Valley, which maintains local responsibility for fire protection services and is served by the San Bernardino County Fire Department. According to CalFire's Fire Hazard Severity Zone (FHSZ) maps, the project site is within a Local Responsibility Area (LRA) (ref. **Figure 4.20-1**) and is not located in a State Responsibility Area (SRA) or within a Very High Fire Hazard Severity Zone (VHFHSZ) (ref. **Figure 4.20-2**). However, surrounding areas of Yucca Valley do include VHFHSZ designations, and the Town has adopted fire safety standards accordingly.

The project involves the development of a self-storage facility, internal drive aisles, perimeter fencing, and improved access along Newton Lane. The site plan includes two 30-foot-wide driveways providing ingress and egress, which would facilitate emergency vehicle access and on-site circulation. These design features are consistent with Town of Yucca Valley General Plan Safety Element and San Bernardino County Fire Department requirements for emergency response access.

Implementation of the project would not conflict with the Town's adopted local Hazard Mitigation Plan (Town of Yucca Valley, 2014) or the San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan (County of San Bernardino, 2022). The proposed improvements do not involve road closures or modifications that would hinder evacuation routes. The project would also be subject to standard fire code compliance, including hydrant spacing, fire-flow requirements, and emergency access provisions under the California Fire Code. Therefore, while the project is in proximity to fire-prone areas, it is not situated within a designated VHFHSZ and would not impair emergency response or evacuation plans. The project would have a less than significant impact.

Figure 4.20-1
FIRE HAZARD SEVERITY ZONE - LOCAL RESPONSIBILITY AREA

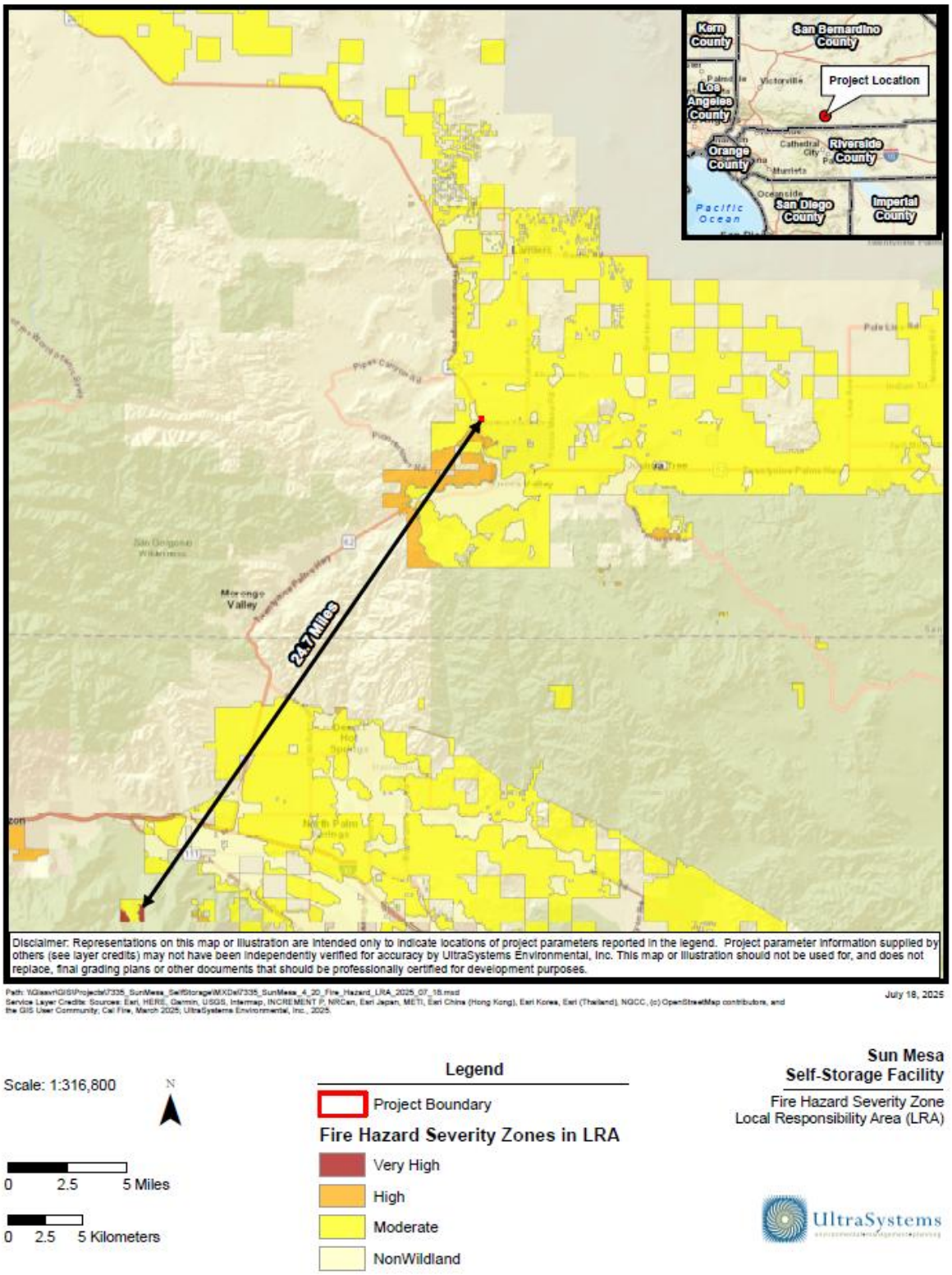
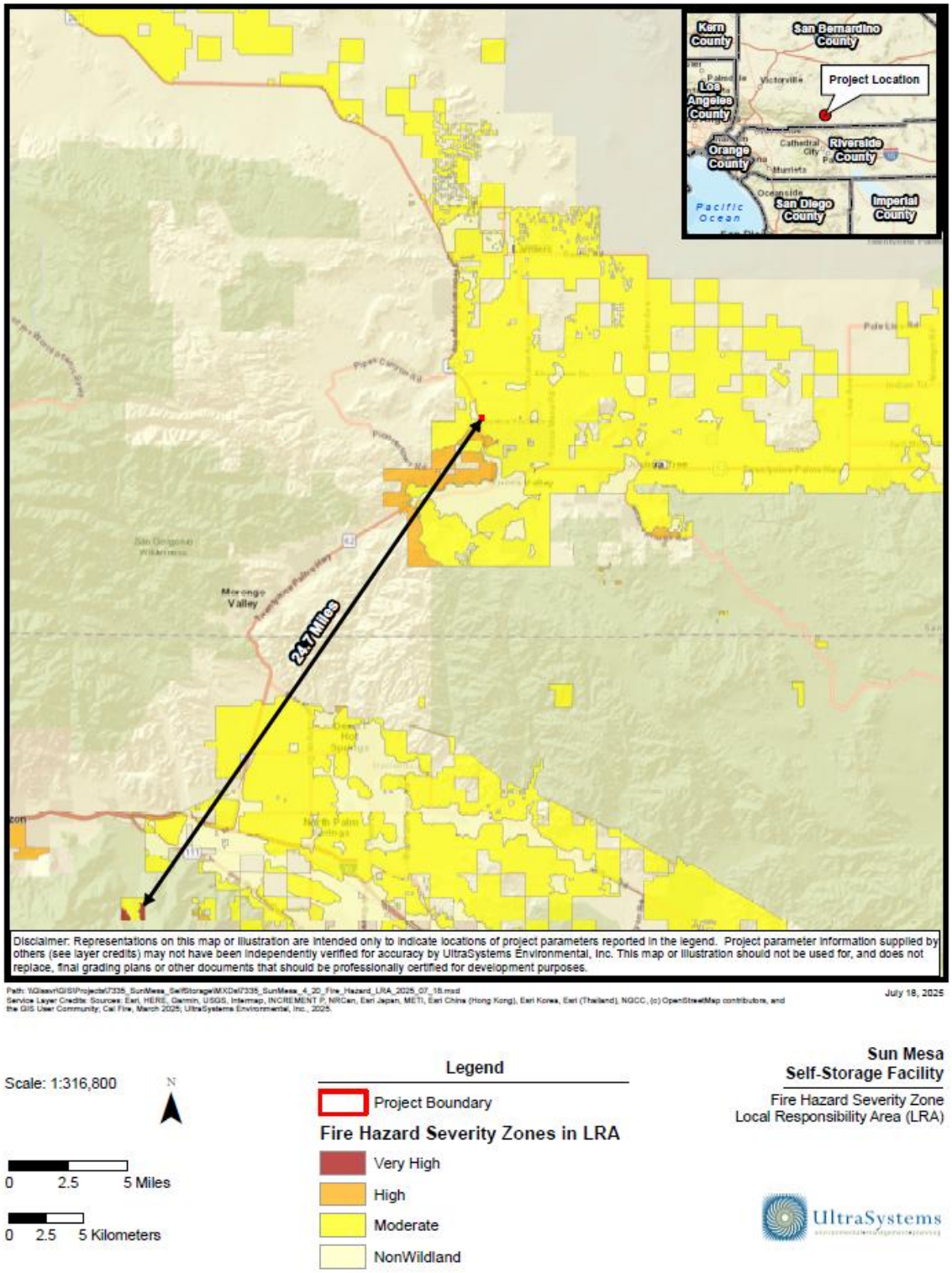


Figure 4.20-2
FIRE HAZARD SEVERITY ZONE - STATE RESPONSIBILITY AREA



If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact

The project site is located within a LRA (not an SRA) and is not classified as a VHFHSZ per CalFire mapping, but areas surrounding the Town do contain VHFHSZ designations, and the regional landscape, characterized by desert scrub vegetation and seasonal winds, poses moderate fire risk.

The project site is relatively flat and is not situated on or near significant slopes that would contribute to fire intensity or spread. Site improvements include the removal of existing combustible vegetation, installation of irrigated landscaping using drought-tolerant, low-fuel species, and a six-foot-tall concrete masonry wall around the project perimeter will reduce opportunities for off-site wildfire intrusion. Additionally, the use of non-combustible building materials and on-site hydrants would further minimize fire risks.

Although Yucca Valley is subject to periodic high winds (including Santa Ana-type events), The facility consists primarily of enclosed, non-habitable self-storage units, with minimal on-site human presence aside from a manager's office reducing the potential exposure to wildfire-related pollutant concentrations.

The project would also comply with applicable provisions of the California Building Code (Chapter 7A, Wildland-Urban Interface Building Standards) and the Town's adopted fire prevention requirements, including defensible space and ember-resistant construction features, where applicable.

Given the site's LRA classification, low topographic risk, and limited occupancy characteristics, the project would not exacerbate wildfire risks or significantly expose occupants to fire-related pollutants and would have a less than significant impact.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact

The project site lies in a portion of Yucca Valley surrounded by similar urban infrastructure and land uses. The project includes limited infrastructure improvements typical for current development, such as internal driveways, frontage improvements along Newton Lane, utility tie-ins, and installation of a private on-site septic system for wastewater disposal. The septic system will be located entirely within the project site and designed in accordance with San Bernardino County Environmental Health Services requirements, including setbacks, leach field sizing, and maintenance access. This system does not increase wildfire risk, as it does not involve combustible materials or elevated fire exposure.

The project does not require the installation of new underground power lines, off-site fuel management areas, or expanded emergency access corridors beyond those required by local development standards. Water supply infrastructure will tie into existing municipal systems, and fire hydrants will be installed as required by the San Bernardino County Fire Department to serve the site.

Construction activities will result in temporary ground disturbance and minor air emissions, but these impacts will be addressed through compliance with construction best management practices and mitigation identified in the Initial Study.

As such, the required infrastructure is not located in areas of high fire risk and would not contribute to increased wildfire hazards. Therefore, fire risk associated with infrastructure installation or maintenance would have a less than significant impact.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Less Than Significant Impact

The site is relatively flat and does not exhibit steep slopes or topographical features that would be prone to landslides or significant post-fire slope instability. As detailed in **Section 4.11**, the surrounding area consists of vacant desert land and sparse industrial development. The property directly north abuts the dedication and dirt road of Sun Mesa Drive, with an undeveloped parcel beyond. That parcel is zoned Industrial. To the east, the adjacent property is zoned Commercial and is also vacant. The property to the south is developed with a commercial use, and the property to the west is developed with another commercial use.

Because the site and its surroundings do not include hillside areas or significant drainage channels, and the site is not located downstream of areas prone to wildfire burn scars, the risk of exposure to post-fire debris flows, flooding, or slope failure is minimal. Additionally, the project will be subject to a grading and drainage plan approved by the Town of Yucca Valley and the San Bernardino County Flood Control District, which will ensure proper site runoff management and minimize erosion or instability.

Therefore, the project would not expose people or structures to significant risk related to wildfire-induced hydrologic or geologic hazards would have a less than significant impact.

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?

Less Than Significant Impact

As discussed in **Section 4.10**, Hydrology and Water Quality, the project site is relatively flat, with no steep slopes or natural drainage courses onsite or in the immediate vicinity. The site is not located within a mapped landslide hazard zone or area of slope instability (Town of Yucca Valley, 2014). Drainage improvements would consist of curb, gutter, and an infiltration basin designed in accordance with Town of Yucca Valley Municipal Code \ Code § 9.37.060: Erosion Control, Runoff, and Enforcement and San Bernardino County Flood Control District standards.

The project would not substantially alter existing drainage patterns or create conditions that could lead to downstream flooding or post-fire slope instability. As noted in **Section 4.10(c)**, the project site lies within FEMA Flood Zone X, outside both the 100-year and 500-year flood hazard areas.

Because the site is level, located outside mapped flood or landslide zones, and would comply with applicable drainage and stormwater regulations, the project would not expose people or structures to significant risks from flooding, landslides, or post-fire slope instability. Therefore, impacts would be less than significant.

4.21 Mandatory Findings of Significance

Would the project have:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

a) Would 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?

<u>Less Than Significant Impact with Mitigation Incorporated</u>

The project would not substantially degrade the environment because all potentially significant impacts related to biological resources, cultural resources, and tribal cultural resources are reduced to less than significant levels through implementation of the adopted mitigation measures. Biological mitigation measures, including **MM BIO-1** through **MM BIO-14**, require preconstruction surveys, burrowing owl protection, breeding bird protections, habitat avoidance, and construction best management practices that prevent disturbance to sensitive species. Cultural resource mitigation measures **MM CUL-1** and **MM CUL-2** ensure that any inadvertent discovery of archaeological resources or human remains is properly evaluated and treated by qualified professionals consistent

with state law. Tribal cultural resource measures **MM TCR-1** through **MM TCR-3** require tribal monitoring, treatment protocols, and avoidance procedures to protect potential tribal cultural materials during ground disturbance. Therefore, the project would not substantially degrade the environment or reduce populations of sensitive species, nor would it eliminate important examples of California prehistory or history. Impacts under this threshold would be less than significant with mitigation.

b) Would the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact with Mitigation Incorporated

The project does not result in cumulatively considerable impacts because all potentially significant environmental effects are reduced to less than significant levels through implementation of project specific mitigation. Geologic hazards and paleontological impacts are addressed through **MM GEO-1** and **MM GEO2**, which require implementation of geotechnical recommendations and paleontological monitoring during ground disturbance. Biological mitigation measures **MM BIO-1** through **MM BIO-14** avoid and minimize impacts to sensitive species and habitat. Cultural resource measures **MM CUL-1** and **MM CUL-2** ensure proper evaluation and handling of archaeological resources and human remains. Tribal resource measures **MM TCR-1** through **MM TCR-3** ensure tribal participation and protection of potential tribal cultural resources. Because these measures fully mitigate project level impacts to less than significant levels, the project would not contribute to a cumulatively significant environmental effect. Therefore, the project's contribution to cumulative impacts is not considerable under CEQA Guidelines §15064(h)(1), and impacts would be less than significant with mitigation incorporated.

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

Less than Significant Impact with Mitigation Incorporated

The project would not cause substantial adverse effects on human beings because all potentially significant hazards are mitigated to less than significant levels. Geotechnical risks such as liquefaction or unstable soils are reduced through **MM GEO-1**, which requires incorporation of site specific geotechnical recommendations, and **MM GEO-2**, which establishes paleontological monitoring protocols that prevent unsafe or unregulated excavation activity. Construction phase biological and cultural mitigation (**MM BIO-1** through **MM BIO-14**, **MM CUL-1**, **MM CUL-2**) also reduce risks to workers and the public by requiring controlled procedures during ground disturbance. Noise, air quality, hazardous materials, and hydrology impacts analyzed in the technical sections were found to be less than significant or less than significant with mitigation incorporated. With implementation of all required mitigation measures, the project would not result in substantial adverse effects on human beings. Therefore, the project would not result in substantial adverse effects on human beings, either directly or indirectly, and impacts would be less than significant with mitigation.

5.0 REFERENCES

ARB, 2008. AB 32 Climate Change Scoping Plan. Accessed online at https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan on September 29, 2025.

ARB, 2022. 2022 Scoping Plan Documents. Accessed online at https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents on September 29, 2025.

ARB, 2024. California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators. Accessed online https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf on September 29, 2025.

ARB, 2025. iADAM Air Quality Data Statistics. California Air Resources Board. http://www.arb.ca.gov/adam. Accessed August 2025.

Atkins. 2015. Greenhouse Gas Development Review Process, County of San Bernardino. March. Accessed online at www.sbcounty.gov/Uploads/lus/GreenhouseGas/FinalGHGUpdate.pdf in September 2024.

California Legislative Information, 2025. Food and Agricultural Code – FAC. Division 23. California Desert Native Plants [80001 - 80201]. Available: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FAC&sectionNum=80073. Accessed October 8, 2025.

Caltrans, 2015. California Department of Transportation, California Scenic Highway Mapping System, Available online at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/. Accessed: April 14, 2020.

Caltrans. 2019. Structure Technical Policy 6.2: Steel Pedestrian Bridge Superstructures. Accessed online on July 25, 2025 at https://dot.ca.gov/-/media/dot-media/programs/engineering/documents/structure-technical-policy/section-6/201911-stp0602steelpedestrianbridgesuperstructures-a11y.pdf.

Caltrans (California Department of Transportation), 2022a. Highway Design Manual. Chapter 610: Pavement Engineering Considerations. Accessed online on June 5, 2025 at: https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp0610-092923-a11y.pdf.

Caltrans (California Department of Transportation), 2022b. Bridge Design Practice Manual. Accessed online at http://dot.ca.gov/programs/engineering-services/manuals/bridge-design-practice , on July 25, 2025.

CAPCOA, 2017. California Emissions Estimator Model (CalEEMod) Version 2022.1.1.28. Accessed online at https://www.caleemod.com/ on December 15, 2025.

CAPCOA, 2008. CEQA & Climate Change. Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January 2008. Accessed online at https://www.ncuaqmd.org/files/1997c676d/CAPCOA-White-Paper_CEQA_Climate_Change.pdf on September 29, 2025.

CASQA (California Stormwater Quality Association). 2023. California Construction Best Management Practices Handbook. Redondo Beach, California. Available by subscription from California Stormwater Quality Association, casqa.org.

CBWCD (Chino Basin Water Conservation District) 2022. Where Does Our Water Come From? https://www.cbwcd.org/386/Where-Does-Our-Water-Come-From. Accessed November 2025.

CDFW (California Department of Fish and Wildlife), 2000. California Wildlife Habitat Relationship System. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2659 . Accessed October 9, 2025.

CDFW (California Department of Fish and Wildlife), 2012. Staff Report on Burrowing Owl Mitigation. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843. Accessed October 10, 2025.

CDFW (California Department of Fish and Wildlife), 2025a. BIOS Habitat Connectivity Viewer. Available at: https://wildlife.ca.gov/Data/BIOS . Accessed on October 8, 2025.

CDFW (California Department of Fish and Wildlife), 2025b. Western Joshua Tree Conservation Plan (August 2025). Available: https://wildlife.ca.gov/Conservation/Environmental-Review/WJT/Conservation-Plan . Accessed October 9, 2025

CDFW (California Department of Fish and Wildlife), 2025c. Special Animals List (October 2025). Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline . Accessed October 8, 2025.

CDFW (California Department of Fish and Wildlife), 2025d. California Natural Community List (February 27, 2025). Available https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline . Accessed October 8, 2025.

CDFW (California Department of Fish and Wildlife), 2025X. California Natural Diversity Database (CNDDB). State and Federally Listed Endangered and Rare Plants of California. California Department of Fish and Wildlife. Sacramento, CA. Accessed online at https://wildlife.ca.gov/Conservation/CESA#species on July 28, 2025.

CEC, 2023. New Data Shows Growth in California's Clean Electricity Portfolio and Battery Storage Capacity. Accessed online https://www.energy.ca.gov/news/2023-05/new-data-shows-growth-californias-clean-electricity-portfolio-and-battery on September 29, 2025.

CEC, 2025. 2025 Building Energy Efficiency Standards. Accessed online at https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency, on August 18, 2025.

Center for Biological Diversity et al., 2024. Petition Before the California Fish and Game Commission to List California Populations of the Western Burrowing Owl (Athene cunicularia hypugaea) as Endangered or Threatened Under the California Endangered Species Act. Available at: https://biologicaldiversity.org/species/birds/western_burrowing_owl/pdfs/CA-

Burrowing-Owl-Petition-3-5-24.pdf . Petitions to List Species Under the California Endangered Species Act. Accessed on October 8, 2025.

CNPS (California Native Plant Society), 2025. A Manual of California Vegetation Online Edition. Retrieved from: https://www.cnps.org/vegetation/manual-of-california-vegetation. Accessed on October 8, 2025.

CNRA (California Natural Resources Agency), 2007. The California Environmental Quality Act (CEQA). Guidelines for Implementation of the California Environmental Quality Act. Electronic document.

Cornell Law School, 2025. California Code Regs. Title 14, § 460 - Fisher, Marten, River Otter, Desert Kit Fox and Red Fox. Available: https://www.law.cornell.edu/regulations/california/14-CCR-460 . Accessed October 8, 2025.

County of San Bernardino, 2025a. 88.01.060: Desert Native Plant Protection. Available: https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-175924 . Accessed October 9, 2025.

County of San Bernardino, 2025b. Land Use Map. Accessed at https://www.arcgis.com/apps/webappviewer/index.html?id=f23f04b0f7ac42e987099444b2f46bc2, on September 16, 2025.

Dibblee, T.W., and Minch, J.A., 2008. Geologic map of the Joshua Tree & Twentynine Palms 15-minute quadrangles, Riverside & San Bernardino Counties, California. Accessed online on August 5, 2025 at https://ngmdb.usgs.gov/Prodesc/proddesc_85245.htm .

DRP (DRP Enterprises, LLC), 2024a. Phase I Environmental Site Assessment Yucca Valley Property Southeast Corner of Sun Mesa Drive and Newton Lane Yucca Valley, California APN: 0597-111-67-0000. October 31, 2024, and updated on July 17, 2025.

DRP (DRP Enterprises, LLC), 2024b. Drainage Study For Sun Mesa Road, Yucca Valley, CA 92284 Datum: NAVD88. November 10, 2024.

Gallagher, Sylvia., 1997. Atlas of Breeding Birds, Orange County, California. Sea and Sage Audubon Press, Irvine, CA.

Google Earth Pro. 2025. Version 7.3.6.10201 (January 13, 2025). Newton Lane, San Bernardino County, California. 34.100052°, -116.251450°. Eye altitude 3722 feet. Imagery Date: April 13, 2023. ©Google 2025. Accessed on December 12, 2025.

Haug, E.A., B.A. Millsap, and M.S. Martell, 1993. The Burrowing Owl (Speotyto cunicularia). In Poole, A. and F. Gill (editors). The Birds of North America, No. 61. Philadelphia: The Academy of Natural Sciences; Washington, D.C. The American Ornithologists' Union.

HDWD (Hi-Desert Water District), 2020. Initial Study/Environmental Assessment: Phase II and Phase III Sewer Collection System Project, Hi-Desert Water District, Yucca Valley, CA. Figure 3A: Sewer Master Plan. Accessed online on October 21, 2025 at: https://www.hdwd.com/DocumentCenter/View/468/HDWD_Figure3A_HDWD-Sewer-Master-Plan-PDF.

Hendriks, R., Rymer, B., Buehler, D., And Andrews, J., 2013. Technical Supplement to the Caltrans Traffic Noise Analysis Protocol. Division of Environmental Analysis, Sacramento, CA. Available at https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf . Accessed November 2025.

Holland, R.F., 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, The Resources Agency, Nongame Heritage Program, California Department of Fish & Game, Sacramento, Calif. 156 pp.

IPCC, 2007b. Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Intergovernmental Panel on Climate Change. Core Writing Team; Pachauri, R.K; Reisinger, A., eds., 2007. ISBN 92-9169-122-4.

LSA (LSA Associates, Inc.), 2024a. Noise and Vibration Impact Analysis for the Sun Mesa (Billings) Mini Storage Project, Yucca Valley, San Bernardino County, California. September 13, 2024

LSA, 2024b. Sun Mesa Mini Storage Project Trip Generation and Vehicle Miles Traveled Memorandum (LSA Project No. 20231230). July 18, 2024.

LSA, 2025a. Air Quality, Energy, and Greenhouse Gas Technical Memorandum for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California. September 16, 2025.

LSA, 2025b. Biological Resources Assessment for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (APN 0597-111-67-0000). October 24, 2025.

LSA, 2025c. Western Joshua Tree Census for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (LSA Project No. 20231230). September 26, 2025.

LSA, 2025d. Rare Plant Survey for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (LSA Project No. 20231230). September 26, 2025.

LSA, 2025e. Cultural Resources Assessment, Sun Mesa Mini Storage Project, Town of Yucca Valley, San Bernardino, California. Prepared by: Riordan Goodwin, RA, and Cassidy Sharp, RPA, LSA. LSA Project No. 20252490. August 22, 2025.

MDAQMD (Mojave Desert Air Quality Management District), 1995. Final Mojave Desert Planning Area, Federal Particulate Matter (PM10) Attainment Plan. Accessed online at https://www.mdaqmd.ca.gov/home/showpublisheddocument/176/636305689057870000 . September 4, 2025.

MDAQMD, 2008. Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area). Accessed online at https://downloads.regulations.gov/EPA-R09-OAR-2017-0028-0014/attachment_7.pdf on September 4, 2025.

MDAQMD, 2020a. CEQA and Federal Conformity Guidelines. Accessed online at https://www.mdaqmd.ca.gov/home/showpublisheddocument/8510/637406182097070000 . September 29, 2025.

MDAQMD, 2020b. Certification of District Measures to Reduce PM Pursuant to Former Health & Safety Code §39614(d). Accessed online at https://www.mdaqmd.ca.gov/rules/overview#docaccess-68b73d1058cefbf6fe54d83ee8a8aae84d2072b29af6f338a6cb7abe6a4602ac on September 29, 2025.

MDAQMD, 2020c. Rule 403 Fugitive Dust Control. Accessed online at https://www.mdaqmd.ca.gov/home/showpublisheddocument/8482/637393282546170000 on September 29, 2025.

MDAQMD, 2022. About MDAQMD. Accessed online at https://www.mdaqmd.ca.gov/about-us . on September 4, 2025.

Moskowitz, David, and Huyett, Allison, 2017. Remote Camera Trap Installation and Servicing Protocol. Conservation Northwest and Wilderness Awareness School. Available at: https://www.conservationnw.org/wp-content/uploads/2018/03/2017-Camera-Protocol- General_Updated_1Mar2018.pdf . Accessed October 9, 2025.

MWDSC, 2021. Mills Treatment Plant. Accessed online at: http://www.mwdh2o.com/AboutYourWater/Water-Quality/henry-j-mills/Pages/default.aspx , on March 26, 2021.

NASA, 2024. The Causes of Climate Change. Accessed online at https://science.nasa.gov/climate-change/causes/ on September 29, 2025.

NOAA, 2025. Global Monitoring Laboratory. Trends in Atmospheric Carbon Dioxide (CO2). Global Monthly Mean CO2. Accessed online at https://gml.noaa.gov/ccgg/trends/global.html on September 29, 2025.

PlaceWorks, 2020. Western Joshua Tree Ordinance. Prepared for the Town of Yucca Valley. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=184953#:~:text=9.09.050%2C%209.10.040&text=040%20of%20the%20Town's%20Development,Sections%209.07 . Accessed on October 8, 2025.

Rosenberg, D.K. and K.L. Haley, 2004. The Ecology of Burrowing Owls in the Agroecosystem of the Imperial Valley, California. Studies in Avian Biology 27, pages 120-135.

SBCTA, 2021. Regional Greenhouse Gas Reduction Plan (2021). Accessed online at https://www.gosbcta.com/plan/regional-greenhouse-gas-reduction-plan/ on September 29, 2025.

SBCTA, 2024. RIVERSIDE-SAN BERNARDINO-ONTARIO MSA. Priority Climate Action Plan (PCAP). Accessed online https://www.gosbcta.com/wp-content/uploads/2024/03/Riverside_San-Bernardino_Ontario_PCAP.pdf September 29, 2025.

SCAG, 2024. Final Connect SoCal 2024. Accessed online at https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf on September 29, 2025.

SCE (Southern California Edison), 2025. Reliable, Affordable Power for you. Accessed online at at https://www.sce.com/about-us/reliability/meeting-demand#:~:text=Focus%20on%20Affordability,encouraging%20everyone%20to%20conserve%20electricity on July 18, 2025.

Shuford et al., 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

Sibley, David Allen, 2000. National Audubon Society, The Sibley Guide to Birds. Alfred A. Knopf, New York.

Sladden (Sladden Engineering), 2025a. Geotechnical Investigation, Proposed Self-storage Facility SEC Sun Mesa Drive & Newton Lane Town Of Yucca Valley, California. Prepared for Rob Billings. January 2, 2025.

Sladden (Sladden Engineering), 2025b. Percolation Testing for Onsite Sewage Disposal Feasibility, Proposed Self-Storage Facility APN 0597-111-67, SEC Sun Mesa Drive & Newton Lane Town Of Yucca Valley, California. Prepared for Rob Billings. January 14, 2025.

Town of Yucca Valley, 2025. Municipal Code § 8.02.020: Adoption of Building Codes. Town of Yucca Valley, California. Accessed online at https://codelibrary.amlegal.com/codes/yuccavalleyca/latest/yuccavalley_ca/0-0-0-10267 on December 2025.

Town of Yucca Valley, 2014. General Plan and Zoning Map. Accessed online at https://experience.arcgis.com/experience/8d739bc93b044464a62b4d77fc034d48 . on September 16, 2025.

Town of Yucca Valley, 2025. Parks and Recreation Facilities. Town of Yucca Valley Community Services Department. https://www.yuccavalley.org/our-town/departments/community-services/parks. Accessed December 15, 2025.

USEPA, 2025a. Nitrogen Dioxide (NO_2) Pollution. Basic Information about NO_2. Accessed online at https://www.epa.gov/no2-pollution/basic-information-about-no2#Effects on December 15, 2025.

USEPA, 2025b. California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants. Accessed online at https://www3.epa.gov/airquality/greenbook/anayo_ca.html, on December 15, 2025.

USEPA, 2025c. Basic Information about Carbon Monoxide (CO) Outdoor Air Pollution. Accessed online at https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution#What%20is%20CO, on December 15, 2025.

USEPA, 2025d. Particulate Matter (PM) Basics. Accessed online at https://www.epa.gov/pm-pollution/particulate-matter-pm-basics#PM, on December 15, 2025.

USEPA, 2025e. Ground-level Ozone Basics. Accessed online https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#wwh, on December 15, 2025.

USEPA, 2025f. Nitrous Oxide Emissions. Accessed online at https://www.epa.gov/ghgemissions/nitrous-oxide-emissions on September 29, 2025.

USEPA, 2025g. Sources of Greenhouse Gas Emissions. Accessed online at https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions on September 29, 2025.

WRCC, 2016. Western U.S. Climate Historical Summaries, Western Regional Climate Center. Accessed online at https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca4405 on September 2025.

6.0 LIST OF PREPARERS

6.1 CEQA Lead Agency

Town of Yucca Valley
Community Development Department
58928 Business Center Drive
Yucca Valley, CA 92284
Jared Jerome, Associate Planner
(760) 369-6579 x317
jjerome@yucca-valley.org

6.2 Project Applicant

Rob Billings
5024 Wallaby Street
Yucca Valley, CA
(760) 686-4171
billingstransfer@yahoo.com

6.3 UltraSystems Environmental, Inc.

6.3.1 Environmental Planning Team

Betsy Lindsay, MURP, ENV SP, Project Director
Robert Reicher, MBA, B.S., ENV SP, Project Manager
Billye Breckenridge, B.A., Deputy Project Manager

6.3.2 Technical Team

Amir Ayati, B.S., Staff Scientist
Andrew Soto, B.A., Word Processing/Technical Editing
Erik Segura, B.S., ENV SP, Associate Planner
Hugo Flores, B.S., Field Biologist
Isha Shah, M.S., Staff Engineer/Scientist
Marissa Kassisieh, MURP, Associate Planner
Maritza Vasquez, M.A., GIS Analyst/Associate Planner
Megan Doukakis, M.A., Assistant Project Archaeologist
Michael Milroy, B.S., M.S., Senior Planner
Patricia Haigh, B.S., B.A., Staff Scientist
Steve Borjeson, B.A., Senior Planner

7.0 MITIGATION MONITORING AND REPORTING PROGRAM

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Public Resources Code and Section 15097 of the CEQA Guidelines. These provisions require that all state and local agencies establish a monitoring or reporting program whenever approval of a project is based on a Mitigated Negative Declaration (MND) or an Environmental Impact Report (EIR) that identifies significant environmental impacts which can be mitigated to a less than significant level. The MMRP serves as a critical compliance mechanism to ensure that mitigation measures adopted as conditions of project approval are properly implemented throughout the course of project development and operation.

> Public Resources Code § 21081.6(a)(1): *"The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment."*.
>
> CEQA Guidelines § 15097(a): *"In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects."*.

The MMRP is designed to ensure that the mitigation measures identified to reduce or avoid potentially significant adverse environmental effects are carried out as intended. Monitoring generally consists of ongoing or periodic oversight activities which may include field inspections, review of documentation, and evaluation of compliance actions. Reporting generally involves the preparation and submission of written compliance reviews or summary memos that are presented to the decision-making body or designated staff representative of the lead agency. These compliance reports serve to confirm whether each mitigation measure is being implemented in accordance with the conditions of approval and provide a basis for corrective action if noncompliance is observed.

The purpose of the MMRP is fourfold. First, it provides a structured framework for documenting the implementation of each required mitigation measure. Second, it identifies the specific agencies, departments, or parties responsible for implementing and monitoring each measure. Third, it creates a formal record of all monitoring and reporting actions to demonstrate full compliance with the environmental commitments made under CEQA. Fourth, it ensures that all mitigation measures that fall under the jurisdiction of the Town of Yucca Valley or the project applicant are fully and effectively carried out in a timely and verifiable manner.

The following table, titled **Table 7.0.1** Mitigation Monitoring and Reporting Program, presents a detailed summary of the environmental impacts and corresponding mitigation measures adopted by the Town of Yucca Valley in connection with the proposed project. The table also includes the level of significance remaining after mitigation, the parties responsible for implementation and monitoring, and the phase of the project during which the measure is to be applied, such as during planning, construction, or long-term operation.

Only those environmental topics for which mitigation is required are included in this Mitigation Monitoring and Reporting Program. This targeted approach ensures that mitigation tracking is manageable, legally sufficient, and appropriately focused on measures that are essential to reducing the project's potentially significant environmental impacts.

Table 7.0-1
MITIGATION MONITORING AND REPORTING PROGRAM

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
4.4 Biological Resources				
Threshold a): Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	**BIO-1: Biological Monitor** a) A biological monitor will be onsite to monitor activities that result in the clearing or grading of areas known to contain sensitive biological resources, such as western Joshua tree habitat, as well as ground-disturbing activities that impacts do not exceed the limits of construction and minimize the likelihood of inadvertent impacts to special-status plant and wildlife species. b) The biological monitor will ensure that all biological mitigation measures, best management practices (BMPs), avoidance and protection measures described in the relevant project permits and reports are in place and are adhered to. Monitoring will cease when the sensitive habitats and jurisdictional areas have been cleared or impacted. The biological monitor will take photographs throughout the construction process. Observations of special-status species will be recorded in monitoring logs, mapped, and special-status species records will be submitted to the California Natural Diversity Database (CNDDB) within five working days of the sightings, and CDFW will be provided with copies of the CNDDB forms and survey maps. Monitoring logs will be completed for each day of monitoring. c) The biological monitor will have the authority to halt all construction activities and all non-emergency actions if listed species are identified on the project site and will be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If needed, and if authorized by	Project Applicant Biological Monitor	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	the resource agencies, the monitoring biologist will relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if CDFW and/or the USFWS determine that the activity will not result in impacts to the species. d) d) If sensitive biological resources are detected in an area to be impacted, then appropriate measures will be implemented by the biological monitor to avoid impacts (i.e., flag and avoid, erect orange snow fencing, biological monitor present during work, etc.). However, if avoidance is not possible and the sensitive biological resources will be directly impacted by project activities, the biological monitor will mark and/or stake the site(s) and map the individuals on an aerial map and with a GPS unit. The biologist will then contact the appropriate resource agencies to develop additional mitigation measures prior to commencing project activities. e) The construction crew will inspect excavated areas daily to detect the presence of trapped wildlife.			
	a) **BIO-2: Project Limits and Designated Areas** b) To avoid impacts to sensitive biological resources, the following measures will be implemented by the project proponent, contractors, and biological monitor prior to project staging, and commencement of any ground-disturbing activities or vegetation removal. c) Project boundary would be set at the minimum size to accomplish necessary work, resulting in minimal impacts to sensitive biological resources and jurisdictional areas. d) Specifications for the project boundary, limits of construction, project-related parking, storage areas, laydown sites, and equipment storage areas will be mapped and clearly marked in	Project Applicant Biological Monitor	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	the field with temporary fencing, signs, stakes, flags, rope, cord, or other appropriate markers. All markers will be maintained until the completion of activities in that area. e) To minimize the amount of disturbance, the construction/laydown areas, parking areas, staging areas, storage areas, spoil areas, and equipment access areas will be restricted to designated areas. To the extent possible, designated areas will comprise existing disturbed areas (parking lots, access roads, graded areas, etc.). f) Project-related work limits will be defined, and work crews will be restricted to designated work areas. Disturbance beyond the actual construction zone is prohibited without site-specific surveys. g) Project related vehicle traffic will be restricted to established roads, staging areas, and parking areas. Travel outside construction zones will be prohibited.			
	BIO-3: Western Joshua Tree Conservation Act Prior to the initiation of Joshua trees encroachment, trimming, pruning, or any activity that may result in take of Joshua trees (including removal of live and dead Joshua trees), the project proponent should obtain a California Endangered Species Act (CESA) Incidental Take Permits (ITP) under the western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927.3 and 1927.8). California Fish and Game Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". Mitigation will occur per the stem count per the WJTCA census in lieu fee, or as required by the ITP and WJTCA.	Project Applicant	Field Verification	1. CDFW 2. Town of Yucca Valley 3. Before Construction
	BIO-4: California Desert Native Plants Act Because species of the family Agavaceae (e.g., western Joshua Tree), which have been observed throughout the project site, are covered	Project Applicant	Field Verification	1. Town of Yucca Valley

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	under § 80073(b) of the California Desert Native Plants Act (CDNPA), any impacts will require a permit issued by the commissioner of the sheriff in San Bernardino County pursuant to Chapter 3 § 80073. Prior to commencement of construction activities, including but not limited to mobilization, fencing, staging, vegetation trimming or removal, or ground-disturbing activities, the project proponent will acquire a permit pursuant to Chapter 3 § 80101 and § 80073 of the California Desert Native Plants Act if any of the following species are observed on the project site: a) All species of the family Agavaceae (century plants, nolinas, yuccas) b) All species of the family Cactaceae (cacti), except for the plants listed in subdivisions (b) and (c) of Section 80072 which may be harvested under a permit obtained pursuant to that section c) All species of the family Fouquieriaceae (ocotillo, candlewood) d) All species of the genus Prosopis (mesquites) e) All species of the genus Cercidium (palos verdes) f) Acacia greggii (catclaw) g) Atriplex hymenelytra (desert-holly) h) Dalea spinosa (smoke tree) i) Olneya tesota (desert ironwood), including both dead and live desert ironwood.			2. Town of Yucca Valley 3. Before Construction
	BIO-5: Worker Environmental Awareness Program Worker Environmental Awareness Program (WEAP) for construction personnel shall be conducted and documented prior to onsite disturbances. The training shall include a discussion of the sensitive biological resources within the project site and the potential presence of special-status species. The WEAP shall also include a discussion of special-status species' habitats, protection measures to ensure species	Construction Supervisor Project Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	are not impacted by project activities, project boundaries, penalties for non-compliance, and biological conditions outlined in the project permits. All new employees shall be trained before they access the work site. New employees shall be trained and certified by the Construction Supervisor with the approval of the Project Biologist as approved by CDFW. Each trained individual shall be given a distinctive helmet sticker that will identify those who have received training, signed the training log, and demonstrated the required level of environmental awareness.			
	BIO-6: Construction Best Management Practices Project work crews will use CASQA (or similar) stormwater BMPs as directed by the project's Storm Water Pollution Prevention Plan (SWPPP). These measures will be identified prior to construction and incorporated into construction operations. The project's Qualified SWPPP Practitioner will ensure that construction activities will incorporate all applicable BMPs specified in the SWPPP to prevent erosion from water or wind, sedimentation of receiving waters, and introduction of other pollutants, including non-stormwater pollutants, into drainages crossed by or adjacent to the project site, accidental spills in the project site, including laydown yards and parking areas. BMPs will be maintained on a regular basis pursuant to the requirements of the SWPPP	Project Applicant Qualified SWPPP Practitioner	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction
	Bio-7: Pre-Construction Desert Tortoise Survey Prior to the commencement of project activities, including but not limited to ground disturbance, pre-construction surveys following guidance in the United States Fish and Wildlife's (USFWS) *Preparing for Any Action That May Occur Within the Range of the Mojave Desert Tortoise* (*Gopherus agassizii;* "Guidelines") will be implemented. The Guidelines recommend the applicant contact USFWS prior to surveys. Qualified biologists will conduct pre-construction surveys for desert tortoise no more than 48 hours prior to initiation of Project activities	Project Applicant Qualified Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	and after any pause in Project activities lasting 30 days or more. The qualified biologists will follow USFWS's Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii;* "Field Manual"). The qualified biologist will record all signs of desert tortoise, such as scat, burrows, carcasses, courtship rings, drinking depressions, and live sightings, as described in the Field Manual. The qualified biologist will provide a report with a map of the surveyed area (including transects, desert tortoises, and sign) and description of habitat conditions. Should positive survey results occur, the project applicant will secure an incidental take permit under Section 10 of FESA and State incidental take permit under Section 2081 of the Fish and Game Code.			
	BIO-8: Pre-construction Wildlife Surveys Prior to issuance of grading permits, a qualified biologist will conduct pre-construction surveys within areas of suitable habitat for special-status terrestrial wildlife species identified as having moderate or greater potential to occur onsite. Pre-construction surveys will be conducted three days before the commencement of construction activities. If construction activities onsite lapse for one week or more, approved work areas will be re-surveyed by the biologist for new occurrences of the special-status wildlife species. Further consultation with wildlife agencies will be necessary if special-status species are observed onsite and prior to commencing construction activities.	Project Applicant Qualified Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction
	a) **BIO-9: General Wildlife Avoidance and Protection Measures** b) The project proponent would implement the following general avoidance and protection measures to protect wildlife. c) To minimize construction-related mortalities of nocturnally active wildlife species, it is recommended that all non-emergency work be conducted during daylight	Project Applicant Qualified Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	hours. All unnecessary lights shall be turned off at night to avoid attracting wildlife. Nighttime work (and use of artificial lighting) would not be permitted unless specifically authorized. d) If any wildlife is encountered during project activities, it will be allowed to freely leave the area unharmed or the biological monitor will capture the animal, if authorized, and relocate it outside of the construction work limits out of harm's way. e) Listed wildlife species will not be captured, handled, or relocated without specific written authorization from CDFW and/or USFWS. f) Wildlife would not be disturbed, captured, harassed, or handled, unless to relocate the animal out of imminent threat of injury or death. Animal nests, burrows and dens would not be disturbed without prior survey and authorization from the biological monitor. g) Active and inactive nests cannot be removed or disturbed. h) Contractors, subcontractors, employees, and site visitors would be prohibited from feeding or collecting wildlife. i) To avoid the potential for mortality and harassment of wildlife, all non-security related firearms, weapons, and domestic dogs would be prohibited from the project site. j) Contractors, subcontractors, employees, and site visitors shall inspect their vehicles and equipment for the presence of wildlife prior to moving their vehicles and equipment. The biological monitor shall be contacted if a special-status species is detected and is in danger of being harmed. k) All steep-walled pitfalls (trenches, holes, bores, and other excavations) greater than two feet deep used during the			

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	project would be completely covered at all times except when being actively used, to prevent wildlife entrapment (i.e. reptiles and small mammals). If trenches cannot be covered, escape ramps (maximum slope of 2:1) will be provided to allow trapped animals to escape. Exclusion fencing shall be installed around the trench or excavation. Trenches shall be inspected and wildlife removed immediately before backfilling. l) All onsite project workers shall look under their vehicles and equipment before movement. If wildlife is observed, no vehicles or equipment shall be moved until the animal has left the area voluntarily or can be legally relocated. m) Equipment maintenance, lighting, and staging will occur only in designated areas, and shall not block or impede wildlife movement.			
	BIO-10: Pre-Construction Burrowing Owl Surveys A qualified biologist shall conduct a pre-construction BUOW survey in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012) or current CDFW guidance/protocol if changes to the aforementioned 2012 guidance have occurred. A pre-construction BUOW survey (Take Avoidance Survey) shall be conducted no more than 14 days prior to any site disturbance (grubbing, grading, and construction) and again 24 hours prior to ground disturbing activities. Although BUOW was not detected on site during the reconnaissance-level surveys, the BSA contains suitable habitat to potentially support BUOW. The qualified biologist will identify, record, and map with a global positioning system (GPS) unit BUOWs and their sign. Detailed notes and wildlife species encountered during the surveys shall be recorded in field notes.	Project Applicant Qualified Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	If an occupied burrow is found (as indicated by the observation of a burrowing owl or the presence of burrowing owl sign), a 250-foot buffer around the burrow will be staked and flagged and no construction activities will be allowed within the buffer area during the breeding season (February 1 through August 31). The qualified biologist will contact CDFW to assist in the preparation of an Incidental Take Permit (ITP), and development of avoidance, minimization, and mitigation measures, prior to commencing project activities. A relocation program may be necessary and shall be approved by CDFW prior to commencing project activities. If no BUOWs or signs of BUOWs are observed during the preconstruction surveys and concurrence is received from CDFW, project activities may begin, and no further mitigation shall be required.			
	a) **BIO-11: Pre-Construction Breeding Bird Survey** b) If vegetation removal is scheduled within the nesting season, a qualified biologist will conduct a pre-construction nesting bird survey to maintain compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (§§ 3503 and 3503.5), which prohibit take of nesting birds and nests of migratory and non-game bird species. Nesting season is generally considered to be: c) January 1-July 30 for raptors. d) February 1-September 15 for non-raptors. e) A qualified biologist will conduct pre-construction surveys no more than five days prior to when project activities (e.g., mobilization, excavation, grading, vegetation removal) are underway. Should a lapse in project activity be greater than five days, a qualified biologist will conduct additional surveys to maintain compliance. To maximize the detection of nesting birds, surveys must be conducted	Project Applicant Qualified Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	in work areas (e.g., staging, stockpiling, storage, equipment yards, access roads) during favorable weather conditions. A wide variety of shelters and resources are used by avian species; these include barren ground, grasses, forbs, shrubs, trees, rocky outcrops, and man-made structures (dependent on species and conditions). The qualified biologists will interpret physical signs for nesting structures (e.g., manipulation of materials like mud or grass) and direct signs of life (e.g., courtship behaviors, gathering, swooping, alarm calls, pellets). f) If nests are encountered, a qualified biologist will consider individual species tolerance, proximity to construction activity, noise impacts, line-of-sight barriers, and distance (horizontal and vertical) to determine if planned construction activities would impact nesting success. The rate and duration of construction activities will also be considered should the modification of scheduled activities be required to maintain healthy nesting outcomes. g) If the qualified biologist determines construction activities will potentially adversely affect a nest, the biologist must immediately inform the construction manager to halt construction activities (i.e., establish a no-work zone) within a minimum exclusion buffer of 100 feet for songbird nests and 200-500 feet for raptor nests. This no-work zone lawfully avoids the "take" of nesting birds and the mortality of eggs and younglings. Construction activities within the no-work buffer may proceed after a qualified biologist determines the young have successfully fledged the nest and are no longer dependent upon the nest or parents. h) If federal or state protected species are observed during surveys, USFWS and CDFW will be consulted to determine			

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	the appropriate time for project activities to proceed and what specific measures will be taken to ensure protected species are not impacted.			
	BIO-12: Pre-Construction Desert Kit Fox and American Badger Surveys Desert kit fox is a protected species under CCR Title 14, § 460. No more than 14 days prior to the beginning of ground disturbance and/or Project activities, a qualified biologist shall conduct pre-construction surveys to determine if potential desert kit fox burrows/dens are present in the project area. Pre-construction surveys should include transect surveys at a 20-meter transect distance to ensure 100 percent visual coverage of the project area. Surveys may be combined for similar fossorial mammals, such as American badger; combined, concurrent surveys for dissimilar taxa (e.g. plants or birds) shall be prohibited. Use of wildlife camera monitoring to determine presence/absence and burrow/den use is strongly encouraged, in accordance with CDFW approved methods, including *Remote Camera Trap Installation and Servicing Protocol Citizen Wildlife Monitoring Project 2017 Field Season* (Moskowitz and Huyett, 2017) and *Camera-trapping for conservation: a guide to best-practices* (Oliver R. Wearn & Paul Glover-Kapfer, 2017). The pre-construction survey reports will include: (1) the number, location, and status determination of potential desert kit fox and/or badger dens identified during the reporting period, (2) occupancy monitoring status, (3) species present, and (4) estimated number of individuals and associated behaviors observed. Desert kit fox and badger images will additionally be stored on a cloud-based server and additional relevant data will be made available to CDFW upon request. If the pre-construction surveys confirm occupied desert kit fox habitat, project activities shall be immediately halted, and the qualified biologist	Project Applicant Qualified Biologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	shall notify CDFW to develop avoidance, minimization, and mitigation measures within a Desert Wildlife Management Plan. No disturbance of active dens shall take place when juvenile desert kit fox may be present and dependent on parental care. Sick or injured animals will be reported to CDFW within 24 hours of discovery.			
Threshold b): Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Reference **MM BIO-1** thru **MM BIO 6** above.			
Threshold e): Would the project conflict with any local policies or ordinances protecting biological resources, such as	**BIO-13: Protective Fencing of No Work Areas** Protective fencing shall be installed around the perimeter of ecologically sensitive areas, which will be designated as No Work Areas, including around the perimeter of western Joshua trees scheduled to be transplanted, and native vegetation communities adjacent to work areas, before commencement of staging, fencing, clearing, grading, or other construction activities. The installation of fencing and protection measures around trees and vegetation will comply with the Town's	Project Applicant	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
a tree preservation policy or ordinance?	Native Desert Vegetation Ordinance. The tree protection zone for Joshua tree is a 40-foot radius around the trunk of the tree. Fencing shall be maintained in place during all construction. No construction, grading, staging, or material storage will be allowed within the fence exclusion areas, or within the protected zones of any onsite native trees.			
	BIO-14: Yucca Valley Development Code Section 9.10.040 A native landscaping documentation package ("report") will be submitted to the division and at the time of filing land use applications (i.e., prior to any land disturbing or development activity) and may be combined with landscaping and water conservation requirements (Town of Yucca Valley, 2014). The report will include a) the botanical and common names of regulated native desert plants, b) the precise location of each regulated desert native plant, c) the trunk or stem diameter of each regulated desert native plant, d) the height of each desert regulated native plant, e) the health or condition, including those unlikely to survive transplanting, of all regulated desert native plants, and f) the proposed placement of the regulated desert plant (i.e., the transplant site, removal determination, or adopt offsite). Should a plant be determined as likely to survive transplanting by a qualified biologist, it shall be made available for adoption or transplanted onsite as part of the project's landscaping plan, which should maximize the use of native desert plants. The project applicant shall provide a thirty-day notice followed by a thirty-day adoption period; the adoption period may be less than thirty days should all plants be adopted. Adoption should be prioritized in the Town of Yucca Valley, with second priority to the Morongo Basin. It is recommended the thirty-day adoption signage period commences with the submittal of the desert native plant permit. Signage posting will follow the requirements found in 9.10.040E. All regulated desert native plants within the adoption program will a) receive written permission to be obtained by the property owner, b) have consideration of lant's original	Project Applicant	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Before Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	and transplanted physical orientation, prevailing wind direction, soil type of the original and transplanted locations, and other related attributes which may affect the successful transplantation, and c) have a maintenance plan considering watering schedules, stockpile location, support, and the method of trap fencing. Plants which are not adopted within the thirty-day period may be removed.			
4.5 Cultural Resources				
Threshold 4.5 b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.	**MM CUL-1:** If archaeological resources are discovered during construction activities, the contractor will halt construction activities in the immediate area and notify the Town of Yucca Valley (California Code of Regulations, Title 14, Chapter 3, Section 15064.5(f)). The project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology who will be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist will recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-L) form and filed with the South Central Coastal Information Center. Construction activities may continue on other parts of the project site while evaluation and treatment of prehistoric archaeological resources takes place.	Project Construction Contractor Qualified Archaeologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. During Construction
Threshold 4.5 c): Disturb any human remains, including those interred	**MM CUL-2:** If human remains are encountered during excavations associated with this project, all work will stop within a 30-foot radius of the discovery,	Project Construction Contractor	Field Verification	1. Town of Yucca Valley

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
outside of formal cemeteries.	and the San Bernardino County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLD (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).	San Bernardino County Coroner		2. Town of Yucca Valley 3. Before Construction
4.7 Geology and Soils				
Threshold 4.7 e): Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**MM GEO-1:** Prior to the issuance of the grading permit, the applicant shall provide a letter to the Town of Yucca Valley Planning Division, or designee, from a qualified paleontologist stating that the paleontologist has been retained to provide services for the project. The paleontologist shall develop, as needed, a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite for the review and approval by the City. The PRIMP shall require that the paleontologist perform periodic paleontological monitoring of any ground disturbing activities within undisturbed native sediments during mass grading, site preparation, and underground utility installation. The project paleontologist may reevaluate the necessity for paleontological monitoring after 50 percent or greater of the excavations have been completed. In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of	Project Applicant Qualified Paleontologist Construction Contractor	Monitoring, Assessment, Recovery, and Curation	1. Town of Yucca Valley 2. Town of Yucca Valley 3. During Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. Criteria for discarding specific fossil specimens shall be made explicit. If the qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if a significant fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository such as the San Bernardino County Museum. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.			
4.18 Tribal Cultural Resources				
Threshold 4.18 b): Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the	**MM TCR-1:** Treatment of Cultural Resources During Project Implementation. If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from Yuhaaviatam of San Manuel Nation (YSMN) and Morongo Band of Mission Indians (Morongo), the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties	Project Applicant	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. Prior to commencement of any "ground-disturbing activity"

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?	shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribes, unless otherwise decided by YSMN and Morongo. All plans for analysis shall be reviewed and approved by the applicant and YSMN and Morongo prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN and Morongo, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, YSMN and Morongo. All reburials are subject to a reburial agreement that shall be developed between the landowner, YSMN and Morongo outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts. Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN and Morongo to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and			

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees. All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and YSMN and Morongo for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, YSMN and Morongo.			
	MM TCR-2: Inadvertent Discoveries of Human Remains. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project	Project Applicant Qualified Archeologist	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. During Construction
	MM TCR-3: **Tribal Cultural Resources Monitoring.** In consultation with interested tribes, the developer, and the Town of Yucca Valley, a Tribal Monitoring Plan (TMP) will be prepared to address the details, timing, and responsibility Tribal Monitoring activities that will occur on the project site. Details in the TMP shall include: 4. Monitoring of project-related ground disturbance (including, but not limited to, brush clearing, grading, trenching, etc.) coordinated with these construction-related activities. 5. The development of a concurrent monitoring schedule in coordination with the developer and the designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including	Project Applicant San Bernardino County Coronerhuman remains, to a	Field Verification	1. Town of Yucca Valley 2. Town of Yucca Valley 3. During Construction

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with the project archaeologist. 6. The protocols and stipulations that the developer, City, Tribes, and project archaeologist will follow in the event of inadvertent TCR discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.			