
Initial Study/Mitigated Negative Declaration

Two-Mile Groundwater Wells Project

FEBRUARY 2026

Prepared for:

LAKE ARROWHEAD COMMUNITY SERVICES DISTRICT

27307 Hwy 189

Blue Jay, CA 92317

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1 Introduction

1.1 Project Overview

The Lake Arrowhead Community Services District (LACSD) provides water and wastewater services to an approximately 15-square mile service area in the San Bernardino Mountains, including Lake Arrowhead and the surrounding communities. To augment available groundwater supplies for LACSD’s service area, LACSD proposes to purchase 2.56 acres of land from Totem Pole Group Inc. The 2.56 acres of land to be purchased by LACSD represents the Project site, which is located outside of the LACSD water service area but within the LACSD sewer service area and sphere of influence. Purchase of the land by LACSD would include the water rights associated with the Project site.

As part of the Two-Mile Groundwater Wells Project (Project), LACSD would drill, construct, develop, and test two potable water supply wells and would develop an associated waterline, holding tank, and water treatment facility building at the Project site. The proposed on-site waterline would connect to an existing off-site waterline in State Route 173 (SR-173) just north of the Project site. Prior to drilling the wells, LACSD would abandon an existing onsite sewer line in the vicinity of the proposed well locations.

1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) requires state and local government agencies to inform decision makers and the public about the potential environmental impacts of proposed projects, and to reduce any significant environmental impacts to the extent feasible. The laws and rules governing the CEQA process are contained in the CEQA statute (Public Resources Code [PRC] Section 21000 et seq.), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), published court decisions interpreting CEQA, and locally adopted CEQA procedures. CEQA applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The Project constitutes a “project” as defined by PRC Section 21065 and is therefore subject to CEQA. CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” As such, LACSD is the Lead Agency responsible for compliance with CEQA for the Project.

As Lead Agency for the Project, LACSD must complete an environmental review to determine if implementation of the Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study (IS) has been prepared to assist in making that determination. Based on the nature and scope of the Project and the evaluation contained in the IS environmental checklist (contained herein), LACSD concluded that a Mitigated Negative Declaration (MND) is the proper level of environmental documentation for this Project. The IS/MND shows that impacts caused by the Project are either less than significant or significant but mitigable with incorporation of appropriate mitigation measures as defined herein. This conclusion is supported by CEQA Guidelines Section 15070, which states that an MND can be prepared when “(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant

effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.”

1.3 Public Review Process

This IS/MND has been prepared to analyze the impacts associated with construction and operation of the proposed Project. LACSD has submitted this IS/MND to responsible and trustee agencies, as well as other potentially affected agencies. A Notice of Intent to Adopt an MND (NOI) was sent to the San Bernardino County Assessor-Recorder-Clerk. Additionally, the IS/MND and technical appendices along with the NOI were submitted electronically to the State Clearinghouse. The NOI has been posted to The Mountain News. The Draft IS/MND has been distributed for review to interested and involved public agencies, responsible/trustee agencies, the last known name and address of all organizations and individuals who have previously requested such notice in writing, and adjacent property owners of the Project site.

In accordance with the CEQA statute and CEQA Guidelines, a public review period for this Draft IS/MND commenced on February 27, 2026 and will conclude on March 30, 2026.

A hard copy of the Draft IS/MND is available for public review during regular business hours at:

Lake Arrowhead Community Services District
27307 CA Hwy 189
Blue Jay, California 92317

Electronic copies of the NOI and Draft IS/MND can be viewed under the “Engineering” tab then “California Environmental Quality Act (CEQA)” tab at the following link:

https://lakearrowheadcsd.com/document_center/index.php#outer-222sub-240

Comments on the Draft IS/MND may be made in writing before the end of the public review period. Following the close of the public comment period, LACSD will consider this Draft IS/MND and comments thereto in determining whether to approve the Project. In accordance with CEQA Guidelines Section 15073, the Draft IS/MND will be available for public review for not less than 30 days. During the public review period, the public will have the opportunity to provide written comments on the information contained within this Draft IS/MND. LACSD’s discretionary approval/refusal of the Project will also be based on the information contained in this document.

In reviewing the Draft IS/MND, interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential Project impacts on the environment, as well as the sufficiency of any mitigation measures proposed to reduce potential impacts to a less-than-significant level. Comments on the Draft IS/MND should be submitted by the end of the public review period and must be postmarked by 4 p.m. on March 30, 2026. Please submit written comments by mail or via email with the subject line “Two-Mile Groundwater Wells Project” to the following address:

Ryan Gross, General Manager
Lake Arrowhead Community Services District
PO Box 700
Lake Arrowhead, California 92352
Email: rgross@lakearrowheadcsd.com

In accordance with Section 15074 of the State CEQA Guidelines, prior to approving the Project, LACSD Board of Directors will consider the IS/MND together with any comments received during the public review period. LACSD will adopt the IS/MND only if it finds that there is no substantial evidence in the record that the Project will have a significant adverse effect on the environment and that the IS/MND reflects the independent judgment and analysis of LACSD. A Notice of Determination (NOD) will be filed with the County Clerk and the State Clearinghouse after adoption of the MND.

2 Project Description

2.1 Project Location

The 2.56-acre Project site is located along State Route 173 (SR-173) within the unincorporated community of Lake Arrowhead in San Bernardino County (County). The Project site, located at 341 State Highway 173, Lake Arrowhead, California, 92352, is on a 2.56-acre portion of Assessor's Parcel Number (APN) 0335-141-06-0000. Regionally, the Project site is located within the San Bernardino National Forest and surrounded by the communities of Blue Jay, Deer Lodge Park, Skyforest, Twin Peaks, Rimforest, and other mountainous communities of the County. Figure 1, Regional and Local Vicinity, illustrates the Project's location in a regional and local context.

2.2 Environmental Setting

2.2.1 Surrounding Land Uses

Lake Arrowhead Reservoir is located approximately 0.5-miles to the north of the Project site. Adjacent surrounding uses include single-family residential land uses and recreational land uses (i.e., camping and hiking paths) associated with the San Bernardino National Forest. Camp Commerce, an all-inclusive campground owned and operated by the City of Commerce, is located northwest of the Project site. An existing, private, potable groundwater well is located approximately 290 feet east of the Project site. Off-site utility lines include an existing natural gas line and a waterline in SR-173 to the north of the Project site.

2.2.2 Project Site

Under existing conditions, most of the Project site consists of open space covered in dense evergreen forest. However, the Project site includes an existing sewer pipeline under an degraded asphalt roadway that runs north/south through the Project site to a dead end on the southern end. The Project site varies in terrain, but it is generally located on a steep hillside.

Land Use Designation and Zoning

The County's Countywide Plan (i.e., General Plan) designates the site as Lake Arrowhead/Single Residential (LA/RS) (County of San Bernardino 2024a). The Project site is zoned as Lake Arrowhead/Single Residential (LA/RS-14M) (County of San Bernardino 2024a). The LA/RS zone permits single-family residential and other compatible uses. In accordance with Section 33.0631 of the San Bernardino County Municipal Code (Municipal Code), construction of groundwater wells requires a permit from the San Bernardino County Department of Public Health, Division of

Environmental Health Services (DPH EHS). Discussion on required permits and approvals for Project implementation are further discussed in Section 2.6, below.

For informational purposes, in October 2020, the County Board of Supervisors repealed the County's community plans (including the Lake Arrowhead Community Plan) and accepted applicable Community Action Guides (County of San Bernardino 2024b). As such, the Lake Arrowhead Communities Community Action Guide provides a framework for development within the following areas: Agua Fria, Blue Jay, Cedar Glen, Crest Park, Deer Lodge Park, Lake Arrowhead, Rimforest, Skyforest, and Twin Peaks.

Subdivision

The Project site is currently privately-owned and is not within the water service area boundaries of LACSD. Totem Pole Group, Inc. currently owns 31 acres of real property on APN 0335-141-06-0000 and is in the process of subdividing said APN into four parcels, Parcels 1 through 4. LACSD would acquire a 2.56-acre portion of Parcel 4 (i.e., the Project site) for purposes of developing the proposed wells and related facilities.

2.2.3 Groundwater

The Project site is located on an approximately 83-acre watershed (Appendix E). Average annual precipitation across the catchment area is approximately 42.9 inches (Appendix E). Although the catchment area is steeply sloped, it is heavily forested, contains minimal impervious surface area, and is overlain by sandy loam soils with moderately low runoff and high drainage potential (Appendix E). As such, runoff from the catchment is estimated to be very low (i.e., no greater than 5%), leaving the majority of water (i.e., 40.8 inches) retained within the watershed (Appendix E). Accounting for runoff and evapotranspiration, the resultant volume of water that is estimated to percolate as groundwater recharge is approximately 20.8 inches per year, or approximately 128,158 gallons per day (Appendix E).

2.2.4 Utilities

Existing utilities in the vicinity of the proposed well locations include an existing sewer line running north/south (approximately following the alignment of an existing on-site degraded asphalt roadway). The off-site utility lines serving the single-family residential uses east of the Project site would not be impacted by the Project. As stated previously, there is a nearby existing potable groundwater well, as shown on Figure 2, Project Site Plan, which would continue to supply potable water to two existing, off-site buildings, and would not be incorporated as part of the Project.

2.3 Project Background and Need

LACSD utilizes multiple sources of water for its supply, including surface water, groundwater, imported water and recycled water, which has been integral in improving water reliability in its service areas. LACSD provides water service to Arrowhead Woods, Deer Lodge Park, and Rimforest (LACSD 2024b). In 2002, LACSD relied entirely on Lake Arrowhead for its supply. Since then, LACSD has added two additional potable supplies and developed a recycled water program to meet the needs of its water service area. Potable water comes mostly from local sources and is supplemented by imported water. Local water consists of treated surface water from Lake Arrowhead and groundwater from nearby groundwater wells. Imported water consists of water supplied by the State Water Project through agreements with the Crestline Lake Arrowhead Water Agency (CLAWA) (LACSD 2024a).

Currently, LACSD operates seven groundwater wells, which provide approximately 150 to 250 acre feet (af) of groundwater per year (LACSD 2024a, LACSD 2024b). This groundwater water is pumped to the treatment plant where it is blended with lake water to reduce hardness of the water.

To augment available groundwater supplies for LACSD's service area, LACSD proposes to develop two new potable water supply wells with a capacity of 30 gallons per minute of water per well.

2.4 Project Characteristics

The Project site is currently privately-owned and is not within the water service area boundaries of LACSD but is within LACSD sewer service boundaries and sphere of influence. As detailed under Section 2.2.2, the Project would include a land acquisition of 2.56 acres from Totem Pole Group, Inc. for development of the proposed wells. With purchase of the land, Totem Pole Group, Inc. would dedicate the water rights associated with the Project site to LACSD. The Project would add two potable groundwater wells and groundwater resources to provide water to its service area to provide additional resiliency and sources of water supply to serve LACSD customers. LACSD would drill, construct, develop, and test these two potable groundwater water supply wells and associated waterline, holding tank, and water treatment facility building at the Project site. The proposed on-site waterline would generally follow the alignment of the existing on-site degraded asphalt roadway and connect to an existing off-site waterline in SR-173 just north of the Project site. The proposed Project features, as well as the existing groundwater well, are illustrated on Figure 2, Project Site Plan. Prior to drilling of the wells, LACSD would abandon a sewer line in the vicinity of the proposed well locations.

2.4.1 Site Preparation and Sewer Line Abandonment

Prior to the implementation of drilling activities, all available utility maps would be reviewed by LACSD. In addition, prior to performing any subsurface activities, the proposed well locations would be surveyed for underground utilities using geophysical methods. The utility-locating contractor would employ several methods, including a ground-penetrating radar, a magnetometer, a magnetic gradiometer, and/or electromagnetic imaging. As required by state law, Underground Service Alert of Southern California (DigAlert) would be notified of the planned drilling activities. DigAlert is a communication center that provides notice to utility owners that may potentially have underground utilities within a project site. DigAlert requires notification be made a minimum of 48 hours prior to conducting any underground excavation. Following map review, geophysical utility locating, and DigAlert clearance, the surface of the ground would be clearly marked where underground utilities are located.

The Project would include abandonment of approximately 600-feet of sewer line in the vicinity of the proposed well locations, located at the Project site. This existing sewer line is generally located beneath the existing on-site degraded asphalt roadway, which is also the proposed alignment of the on-site waterline, as depicted on Figure 2. Existing sewer pipes would be filled with a one-sack cement mortar, and existing 3 by 3 foot manholes would be demolished up to 1 to 2 feet below the ground surface. The rest of the manholes would be filled with sand or Class 2 base to surface. The manhole lid and ring sets would be removed and stored by LACSD off-site. After construction of the waterline and abandonment of the sewer pipes, the existing degraded asphalt road would be repaved with new asphalt within the same alignment and would be located over the existing sewer pipes and proposed waterline.

Although no other utility lines are anticipated to be present within the proposed construction zone, prior to the initiation of drilling activities, an air-knife (or hand auger) would be used to safely excavate a pilot hole to

approximately five feet below ground surface (bgs), to ensure that no underground utilities or obstructions are present.

Equipment required to advance the boring and construct the wells are included in Table 3.3-2, Construction Scenario Details, of Section 3.3, Air Quality. Plastic sheeting would be placed on the ground to prevent accidental leaks of drill rig hydraulic fluid, engine oil, coolant, or drilling fluids from coming into contact with the ground surface. Once the plastic has been placed, the drill rig and drilling fluid system would be positioned on top of the plastic sheeting. Off-road equipment would be mobilized to the Project site and staged in preparation for drilling activities. Site preparation may also include the use of containment tanks.

2.4.2 Proposed Wells and Associated Infrastructure

Well Construction

Construction of the Project would include drilling, installation, sampling, development, and testing of two new production wells (identified as “Well Head #1” and “Well Head #2” on Figure 2) in accordance with federal, state, and local requirements. Well Head #1 is located in the northwestern portion of the Project site, while Well Head #2 would be located at the southern end of the Project site. Well Heads #1 and #2 would be connected by an approximately 750-foot main waterline which would connect to the waterline within SR-173. Trenching activities would be necessary to lay the waterline. The average width of the trench would be 2.5 feet, and the average depth would be 3.5 feet.

Drilling and well installation activities would be performed by a well-drilling contractor in possession of a State of California C-57 license. Drilling and well construction would comply with California Department of Water Resources (DWR) Well Standards Bulletins 74-90 and 74-81, American Water Works Association (AWWA) guidelines, DPH EHS regulations, and County of San Bernadino.

The well construction process for each well would consist of the following general steps: (1) trenching for the waterline; (2) site preparation, (3), borehole drilling; (4) water quality sampling; (5) casing/screen installation; (6) annular seal installation; (7) well development; (8) aquifer testing; (9) disinfection; (10) completion of the wellhead; and (11) paving for the well. Once the drilling and installation of the wells are completed, an approximately 6-foot-wide by 6-foot-length by 5-foot-tall concrete vault and other accessory structures would be constructed at each well head for operations, including treatment and filtration.

Well Development

After completing the installation of the production wells, well development would be performed to mobilize and remove residual particles of crushed rock and sand from the respective wells and boreholes. In general, the order of the development for the production wells are as follows: initial well development by swabbing and airlifting, final development by pumping and surging, and aquifer testing.

Treatment Building and Holding Tank

During the construction and testing of the production wells, water will likely contain a high volume of sediment from the drilling fluids required for borehole advancement. Water and drilling fluids removed from the wells during construction and testing would be conveyed to a treatment system located in the proposed 396-square-foot treatment building located just south of proposed Well Head #1 (refer to Figure 2 for treatment building location).

A holding tank would be located adjacent to the treatment building for settling of solids. The treatment system process flow is as follows: (1) water will be pumped directly from the wells into the settling tanks; (2) water will be pumped through bag filtration for sediment removal; and (3) water processed by the bag filter units will be conveyed to and discharged into a sewer via a direct connection, which is anticipated to be located at the point of intersection between the Project boundary, proposed waterline, and existing sewer on-site.

Pump Development

After the completion of targeted zone development, a submersible test pump would be installed within each well to a selected depth. The pumps would be powered by a portable diesel generator controlled by a variable-frequency drive (VFD) pump controller. The generator would be removed after construction of each well. During this phase, the submersible pumps would be operated at a variety of flow rates, and periodically surged to flush impacted fines from the surrounding gravel pack and borehole face, and to consolidate the gravel pack. During pump development, the pumping water level, drawdown, sand content, and water quality parameters (e.g., pH, conductivity, turbidity, dissolved oxygen, temperature, and oxygen reduction potential) would be monitored.

Aquifer Testing

After development pumping has been completed, two separate pumping tests would be performed: a variable-rate pumping test followed by a constant rate pumping test. Overall, aquifer pump testing would take approximately 10 days.

Well Pump and Motor Installation Activities

A new submersible pump, drop pipe (i.e., pump column), check valve, motor lead, and polyvinyl chloride (PVC) stilling tube (for pressure transducer) would be installed into each well. All pump equipment would be disinfected as it is placed into the wells. Once the pumps are installed, the wellhead flange assemblies would be connected to the conveyance piping. Final equipment installed at each wellhead would include the screened and inverted casing vent, the air vacuum and air release valves, the check valve, and the sampling port. After testing the submersible pump proper rotation, the submersible pump motor leads would be terminated in the control panel, and the pumps would be service ready. Next, disinfection would be performed according to the American National Standards Institute (ANSI/AWWA) Standard C654 well disinfection guideline. Following well disinfection, bacteriological and water quality testing would be performed per LACSD requirements.

2.4.3 Off-Site Impacts

The Project's proposed on-site waterline would connect to an existing off-site waterline in SR-173 just north of the Project site, as shown on Figure 2. This would require site preparation activities, trenching, and paving of a portion of SR-173 to connect the proposed waterline to the existing waterline in SR-173. This would require an encroachment permit from the California Department of Transportation (Caltrans).

2.4.4 Operation and Maintenance

The Project is expected to be operational by March 2027. Routine operation and maintenance activities are anticipated throughout the duration that the production well is active. The Project is anticipated to result in one round trip per day for maintenance activities associated with the proposed wells and treatment building. Operation and maintenance activities are specific to individual systems and will be developed based on equipment and system

components. These activities would involve inspections of the condition and functionality of individual system and equipment components, testing and performance evaluations of system and equipment components, testing of water quality, and inspections of site cleanliness and sanitary conditions.

The on-site potable water wells would be operational for 24 hours per day in order to supply potable water. Ultimately, the proposed waterline would be connected to LACSD's waterline within SR-173, and the water would be used to service LACSD-service areas. The Project's wells would have an approximate depth of 350 to 600 feet bgs and would be capable of producing 30 gpm of water per well (Appendix E). The proposed wells would have an anticipated electrical consumption of approximately 3,425 kilowatt hours (kWh) per month while the proposed treatment building would have an anticipated electrical consumption of approximately 12,167 kWh per month, for a total of 187,104 kWh per year.

2.5 Project Construction and Phasing

Project construction is anticipated to begin in May 2026 and end in March 2027. Construction of Well Head #1 would begin in May 2026 and end in September 2026, while construction of Well Head #2 would begin after construction of Well Head #1, in September 2026 and would end in December 2026. Construction of both wells would consist of trenching for waterlines, site preparation, borehole drilling, water quality sampling, casing/screening installation, annular seal installation, well development, aquifer testing, disinfection, completion of well heads, and paving for the wells. Construction of the proposed treatment building would begin in December 2026, after completion of Well Head #2, and would end in February 2027, consisting of site preparation, grading, trenching, building construction, architectural coating, and paving activities. Finally, construction activity in SR-173 would begin in February 2027 and end in March 2027, consisting of site preparation, trenching, and paving activities. Additional information on construction details, including construction schedule details, average daily worker, vendor, and haul truck trips, and construction equipment projections, can be found in Table 3.3-2, Construction Scenario Details, of Section 3.3, Air Quality.

Construction equipment and materials would be staged on site. During trenching/construction activities in SR-173, partial and temporary street closure is anticipated. However, LACSD will maintain road access through SR-173 during construction activities.

Project construction would occur Monday through Friday between the hours of 7:30 AM and 5:00 PM. No construction activities would be conducted on federal holidays.

Shrubs within the Project work areas may be removed to accommodate site movement. No trees would be removed or replaced during construction; trees would be protected in place.

2.6 Project Approvals

This IS/MND is intended to serve as the primary environmental document, pursuant to CEQA, for the Two-Mile Groundwater Wells Project, including discretionary approvals requested or required to implement the Project. In addition, this is the primary reference document for the formulation and implementation of a mitigation monitoring and reporting program for the Project.

As the Lead Agency, LACSD's Board of Directors may adopt the IS/MND if they find, on the basis of the whole record, that there is no substantial evidence that the Project would have a significant impact on the environment.

Table 2-1, Discretionary Approvals and Requirements, lists all the agencies that are known or expected to have discretionary approval authority over the Project.

Table 2-1. Discretionary Approvals

Agency	Approval/Permit Required	Purpose
Lake Arrowhead Community Services District (LACSD)	Project Approval	Approve the Project and allocate LACSD funds.
State Water Resources Control Board (SWRCB), Division of Drinking Water, Mojave District 27	Permit Amendment Application	Allow for well construction for public drinking water systems.
SWRCB, Lahontan Region	National Pollutant Discharge Elimination System (NPDES) Construction General Permit	For stormwater discharges associated with construction and land disturbance activities, and development of a stormwater pollution prevention plan (SWPPP)
California Department of Transportation	Encroachment permit	To extend water pipeline within State Route 173
San Bernardino County Department of Public Health, Division of Environmental Health Services	Well permit	For construction of wells
Regional Water Quality Control Board, Lahontan Region	401 Water Quality Certification, if necessary	For potential temporary impacts to waters of the state
United States Army Corps of Engineers	Nationwide Permit, if necessary	For potential temporary impacts to 0.0003-acre of jurisdictional non-wetland waters
California Department of Fish and Wildlife	Streambed Alteration Agreement Section 1600, if necessary	For potential temporary impacts to waters of the State

Table 2-2 outlines the ministerial approval/permit required for the Project.

Table 2-2. Ministerial Approvals

Agency	Approval/Permit Required	Purpose
Underground Service Alert of Southern California (DigAlert)	Notify	Notification of planned drilling activities, a minimum of 48 hours prior to conducting any underground excavation

This IS/MND covers all federal, State, local government, and quasi-government approvals that may be needed to construct, implement, or operate the Project, whether or not they are specifically identified in Tables 2-1 and 2-2 or elsewhere in this IS/MND.

3 Initial Study Checklist

1. Project title:

Two-Mile Groundwater Wells Project

2. Lead agency name and address:

Lake Arrowhead Community Services District
PO Box 700
Lake Arrowhead, California 92352

3. Contact person and phone number:

Ryan Gross, General Manager
(909) 336-7100

4. Project location:

341 State Highway 173, Lake Arrowhead, California, 92352

5. Project sponsor's name and address:

Lake Arrowhead Community Services District
PO Box 700
Lake Arrowhead, California 92352

6. General plan designation:

Lake Arrowhead/Single Residential (LA/RS)

7. Zoning:

Lake Arrowhead/Single Residential (LA/RS-14M)

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

As part of the Project, LACSD would drill, construct, develop, and test two potable water supply wells and would include an associated waterline, holding tank, and water treatment facility building on the northwestern portion of the Project site. The proposed on-site waterline would connect to an existing off-site waterline in SR-173, just north of the Project site. Prior to drilling the wells, LACSD would abandon an existing sewer line in the vicinity of the proposed well locations. Refer to Section 2, Project Description, above, for further details.

9. Surrounding land uses and setting:

Lake Arrowhead Reservoir is located approximately 0.5-miles to the north of the Project site. Adjacent surrounding uses include single-family residential and recreational land uses (i.e., camping and hiking paths) associated with the San Bernardino National Forest. Camp Commerce, an all-inclusive campground owned and operated by the City of Commerce, is adjacent to the Project site to the northwest.

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

- State Water Resources Control Board, Division of Drinking Water, Mojave District 27
- State Water Resources Control Board, Lahontan Region
- California Department of Transportation
- San Bernardino County Department of Public Health, Division of Environmental Health Services
- Regional Water Quality Control Board, Lahontan Region
- United States Army Corps of Engineers
- California Department of Fish and Wildlife

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, see Section 3.18, Tribal Cultural Resources, of this IS/MND, for more information.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that requires mitigation, as indicated by the checklist on the following pages.

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

Determination

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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Ryan Gross, General Manager

Signature

02/24/2026

Date

Evaluation of Environmental Impacts

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

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. The term *vista* generally implies an expansive view, usually from an elevated point or open area. A *scenic vista* is an expansive view that possesses visual and aesthetic qualities of high value to the community. Scenic vistas can provide views of natural resources or significant structures and buildings. Under CEQA, scenic vistas also generally, although not exclusively, refer to views that are accessible to broader segments of the public, rather than those available to a limited number of private entities. A significant effect on scenic vistas could occur if the Project were to obstruct or compromise a vista or if it were to degrade or remove a scenic resource that can be observed from a vista.

San Bernardino’s Countywide Plan (i.e., their General Plan) includes goals and policies related to natural resources, including scenic resources. For example, per Goal NR-4, Scenic Resources, “Scenic resources that highlight the natural environment and reinforce the identity of local communities and the county.” In addition, per Policy NR-4.1, Preservation of Scenic Resources, “We consider the location and scale of development to preserve regionally significant scenic vistas and natural features, including prominent hillsides, ridgelines, dominant landforms, and reservoirs.”

Current land use plans governing the Project site do not identify a particular scenic vista for preservation. While there are no officially designated scenic vistas in the Project vicinity, the natural setting of the community, including expansive views of prominent hillsides, ridgelines, dominant landforms, and

lakes/reservoirs are considered scenic vistas for the purposes of this analysis. As such, the nearest scenic vista to the Project site is accessible from the shoreline of Lake Arrowhead, approximately 0.5-miles north of the Project site. The lakeshore offers broad views of the lake and surrounding forested terrain. However, due to distance from the Project site (0.5-miles) and intervening topography and vegetation, the Project site is not visible from the lakeshore and scenic vistas of the lake are not accessible adjacent or near to the Project site. As there are no other scenic vistas in the vicinity of the Project site, Project construction and operation would have no impact on a scenic vista.

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

Less than Significant Impact. There are no officially designated scenic highways that pass by the Project site (Caltrans 2024). The nearest officially designated scenic highway is SR-38, located approximately 21 miles to the west. The Project site is adjacent to and partially visible from SR-173, which is an eligible state scenic highway; however, no corridor protection program has been developed or implemented for SR-173, and thus, it has not been officially designated as scenic by the State. The development on the Project site would not impact any scenic resources, such as trees, rock outcroppings, or historic buildings and would therefore not affect the potential for the SR-173 corridor to be officially designated as scenic by the State, should the County ever prepare a corridor protection program and seek further scenic designation. For these reasons, the Project would not substantially damage scenic resources within a state scenic highway, and impacts would be less than significant.

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 Project site is in a non-urbanized area, pursuant to the Public Resources Code Section 21099. The nearest visible public view into the Project site would be SR-173. SR-173 provides fleeting views of the site by motorists or pedestrians. During construction activities, the Project would result in changes to the existing visual character of the Project site due to the presence of construction vehicles and equipment during drilling and other ground disturbing activities. However, the Project site is located within an area that is surrounded by trees, and as such, provides minimal public views into the Project site from SR-173. Particularly, during construction of Well Head #2, located furthest from SR-173, there would be no public views into the Project site. However, during Project activities located closer to SR-173 (i.e., for drilling of Well Head #1, construction of the treatment building, abandonment of the sewer line, and trenching for the waterline), view of construction activities from SR-173 may be available. Construction activities in SR-173, to connect the proposed waterline to the existing waterline within SR-173, would be available. The Project site is not in an area that is easily viewed by the public, as the tree cover along SR-173 (on the Project site) and intervening topography provide visual screening from public views into the Project site, the views of construction activity from a public view (SR-173) would be temporary and would not change the views substantially at areas visible from a public viewpoint. Construction activity within SR-173 would result in repaving of the asphalt within the road, and as such, post-construction views of SR-173 would be consistent with the pre-construction scenario. Therefore, construction activities would result in less than significant impacts regarding substantial degradation of the existing visual character or quality of public views of the site and its surroundings.

Once construction has been completed, a few small structures would be located on-site, including a treatment building, holding tank, and two 6-foot-wide by 6-foot-length by 5-foot-tall concrete vaults at the locations of Well Heads #1 and #2. However, consistent with the analysis of impacts during construction, as the Project site is not in an area that is easily viewed by the public due to intervening vegetation and topography at the Project site, and views of these on-site structures would be fleeting and minimal. Most of the Project site would not be visible from a public viewshed. Therefore, on-site structures from Project implementation would result in less than significant impacts regarding substantial degradation of the existing visual character or quality of public views of the site and its surroundings.

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. Under existing conditions, most of the Project site consists of open space covered in dense evergreen forest, and there are no existing buildings or light sources on-site. During construction, temporary light and glare would be present because of the use of construction equipment and vehicles. Supplemental lighting may be added during construction to illuminate dimly lit areas; however, these light sources would be temporary and would be removed once the vaults have been installed. Furthermore, construction activities would occur Monday through Friday between the hours of 7:30 AM and 5:00 PM, and minimal or no nighttime lighting would be needed, as construction activities would occur during daylight hours. Additionally, the Project would not include any surfaces that would create glare that could impact the surrounding uses.

Once operational, some directed facility lighting would be provided by the new treatment building. However, the Project would be required to comply with Chapter 83.07, Light Trespass, of the San Bernadino County Municipal Code. The purpose of standards set forth in Municipal Code Chapter 83.07 are to minimize direct glare and prevent excessive lighting, thereby minimizing light trespass and pollution caused by inappropriate or misaligned light fixtures. Per Municipal Code Section 83.07.060, all outdoor light fixtures on the Project site must be fully shielded, installed and maintained in such a manner that the shielding does not permit light trespass exceeding one-tenths foot-candles. Furthermore, light pollution and trespass on site must be minimized through the use of directional lighting, fixture location, height and the use of shielding and/or motion sensors and timers. With compliance with applicable Municipal Code standards, the Project would not create a substantial new source of light relative to the existing condition. Additionally, there would be daily operational trips (on the order of one round vehicle per day), which would likely occur during daylight hours. As such, lighting associated with vehicles at the site would be minimal. Therefore, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. According to the California Department of Conservation, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located on or adjacent to the Project site (DOC 2024). As such, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

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

No Impact. As discussed in Section 2.2, Environmental Setting, the Project site is designated and zoned for residential use. Specifically, the Project site is designated as LA/RS and zoned as LA/RS-14M. Furthermore, according to the DOC, there are no lands subject to a Williamson Act contract on or adjacent to the Project site. As such, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur.

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

No Impact. The Project site is located within the San Bernardino National Forest. However, the Project site is not zoned for forest land, timberland, or Timberland Production. The Project site is zoned for residential use (i.e., LA/RS-14M) and does not propose any rezoning. As such, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production and there would be no impact.

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

Less than Significant Impact. Although the Project site contains forest land, the Project site is zoned and designated for residential use. Furthermore, while the Project would include non-forest uses (i.e., well operation and maintenance), it would not involve any tree removals. Long-term operation and maintenance activities at the Project site would not adversely affect forest resources. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and impacts would be less than significant.

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?*

Less than Significant Impact. As discussed above, there is no Farmland on or adjacent to the Project site, and no conversion of Farmland would occur as a result of Project implementation. Although the Project site includes forest land, the Project would not require any tree removals during construction, and long-term operation and maintenance activities at the Project site would not adversely affect forest resources. Furthermore, off-site impacts would be limited to utility connections in the roadway right-of-way along SR-173, which would not convert forest land to non-forest use or otherwise adversely affect forest resources. As such, the Project would not 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 and impacts would be less than significant.

3.3 Air Quality

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

This section is based on technical analysis conducted by Dudek, including quantitative estimates of air pollutant emissions based on assumptions developed in consultation with the project design engineers. The results of the emissions estimates are provided as Appendix A, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, to this IS/MND.

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

Less than Significant Impact. The Project site is located within the South Coast Air Basin (SCAB), which includes all of Orange County and the western, non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The site is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the SCAB’s air quality management plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for the SCAB is the 2022 AQMP (SCAQMD 2022). The 2022 AQMP provides the regional path towards improving air quality and meeting federal standards for air pollutants. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low oxides of nitrogen (NO_x) technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 federal ozone (O₃) standard by 2037 (SCAQMD 2022).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2022 AQMP, and if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- **Consistency Criterion No. 2:** Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, Project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A. As presented in that analysis and summarized in Section 3.3(b), the proposed Project would not generate construction criteria air pollutant emissions that exceed the SCAQMD's construction thresholds. In addition, the Project would result in a minimal increase in routine maintenance of the area during long-term operations. Therefore, the Project would not conflict with Criterion No. 1.

The second criterion regarding the potential of the proposed Project to exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase is primarily assessed by determining consistency between the proposed Project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Although SCAG's 2024-2050 RTP/SCS has been most recently adopted (SCAG 2024), the SCAQMD used assumptions from SCAG's 2020-2045 RTP/SCS (Connect SoCal) in its 2022 AQMP (SCAQMD 2022).¹ The SCAG 2020-2045 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

The Project would consist of construction of two wells and associated improvements and would not change the underlying land use and zoning designations of the site or result in an increase in population growth in the area. Accordingly, the Project does not conflict with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development and does not propose activities that would induce additional population at the Project site. Therefore, the Project would not conflict with the second criterion. Overall, impacts with regard to the

¹ Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic Projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/Projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities Projections in their 2020-2045 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

Project's potential to conflict with or obstruct implementation of the SCAQMD's 2022 AQMP would be less than significant.

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. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

A quantitative analysis was conducted to determine whether the proposed Project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include O₃, nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and NO_x, which are important because they are precursors to O₃, as well as CO, sulfur oxides, PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status,² the SCAB is designated as a nonattainment area for national and California O₃ standards and PM_{2.5} standards. The SCAB is designated as a nonattainment area for California PM₁₀ standards; however, it is designated as an attainment area for national PM₁₀ standards. The SCAB is designated as an attainment area for national and California CO standards, national and California NO₂ standards, and national and California SO₂ standards (EPA 2023a; CARB 2022a).

The proposed Project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. SCAQMD has established Air Quality Significance Thresholds, as revised in March 2023, that set forth quantitative emission significance thresholds below which a Project would not have a significant impact on ambient air quality (SCAQMD 2023). The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 3.3-1 to determine the potential for the Project to result in a significant impact under CEQA.

² An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the U.S. Environmental Protection Agency and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

Table 3.3-1. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (pounds per day)	Operation (pounds per day)
VOCs	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs ^b	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and acute hazard index ≥ 1.0 (Project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants^c		
NO ₂ 1-hour average NO ₂ annual arithmetic mean	SCAQMD is in attainment; Project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; Project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
PM ₁₀ 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
PM ₁₀ annual average	1.0 $\mu\text{g}/\text{m}^3$	
PM _{2.5} 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d 2.5 $\mu\text{g}/\text{m}^3$ (operation)	

Source: SCAQMD 2023.

Notes: SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; TAC = toxic air contaminant; NO₂ = nitrogen dioxide; ppm = parts per million by volume; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

greenhouse gas emissions thresholds for industrial Projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in this table as they are addressed within the greenhouse gas emissions analysis and not the air quality analysis.

^a The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

^b TACs include carcinogens and noncarcinogens.

^c Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.

^d Ambient air quality thresholds are based on SCAQMD Rule 403.

A project would result in a cumulatively considerable net increase for O₃, which is a nonattainment pollutant, if the proposed project's construction or operational emissions would exceed the SCAQMD's VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O₃ precursors are intended to serve as a surrogate for an O₃ significance threshold (i.e., the potential for adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors

(i.e., VOCs and NO_x) on O₃ levels in ambient air cannot be determined reliably or meaningfully through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) Version 2022.1.1.24 was used to estimate emissions from construction and operation of the Project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects.

Construction Emissions

Construction of the proposed Project would include drilling of two potable water wells, the abandonment of an on-site sewer line, connections to existing utilities, paving activities, and the construction of the treatment building and associated improvements. These construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM₁₀ and PM_{2.5} emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM₁₀, and PM_{2.5}. Construction emissions can vary substantially from day to day depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions.

Proposed Project construction emissions were estimated using information provided the Project engineer. Air quality emissions modeling assumed that construction of the Project would last approximately 11 months. Default values for horsepower and load factor provided in CalEEMod were used for all construction equipment, and the equipment mix was provided by LACSD. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the Project site 5 days per week. Table 3.3-2, Construction Scenario Details, provides the construction phases, start and end dates, number of average daily one-way worker, vendor, and haul truck trips, equipment type and quantity, and usage hours per day.

Table 3.3-2. Construction Scenario Details

Construction Phase	Start Date ¹	End Date ¹	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	Average Daily Vendor Trucks	Average Daily Haul Trucks	Equipment Type	#	Usage Hours per day
Well #1								
Trenching for Waterline	5/21/25	5/31/25	2	2	2	Tractors/Loaders/Backhoes	1	8
Site Preparation	6/1/25	6/11/25	2	2	2	Tractors/Loaders/Backhoes	1	8
Abandonment of Sewer	6/12/25	6/21/25	2	2	2	Tractors/Loaders/Backhoes	1	8

Table 3.3-2. Construction Scenario Details

Construction Phase	Start Date ¹	End Date ¹	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	Average Daily Vendor Trucks	Average Daily Haul Trucks	Equipment Type	#	Usage Hours per day
Borehole Drilling	6/22/25	6/30/25	2	2	2	Bore/Drill Rigs	1	8
Water Quality Sampling	7/1/25	7/11/25	2	2	2	Other	1	8
Casing/Screen Installation	7/12/25	7/13/25	2	2	2	Bore/Drill Rigs	1	8
Annular Seal Installation	7/12/25	7/15/25	2	2	2	Bore/Drill Rigs	1	8
Well Development	7/16/25	7/23/25	2	2	2	Bore/Drill Rigs	1	8
Aquifer Testing	7/24/25	8/02/25	2	2	2	Other	1	8
Disinfection	8/3/25	8/23/25	2	2	2	Other	1	8
Completion of Well Head	8/24/25	9/1/25	2	2	2	Bore/Drill Rigs	1	8
Paving for Well	9/2/25	9/13/25	2	2	2	Paving Equipment Roller	1 1	8 8
Well #2								
Trenching for Waterline	9/22/25	9/30/25	2	2	2	Tractors/Loaders/Backhoes	1	8
Site Preparation	8/1/25	8/11/25	2	2	2	Tractors/Loaders/Backhoes	1	8
Borehole Drilling	8/12/25	8/21/25	2	2	2	Bore/Drill Rigs	1	8
Water Quality Sampling	8/22/25	8/31/25	2	2	2	Other	1	8
Casing/Screen Installation	9/1/25	9/11/25	2	2	2	Bore/Drill Rigs	1	8
Annular Seal Installation	9/12/25	9/21/25	2	2	2	Bore/Drill Rigs	1	8
Well Development	9/22/25	9/30/25	2	2	2	Bore/Drill Rigs	1	8
Aquifer Testing	10/1/25	10/11/25	2	2	2	Other	1	8
Disinfection	10/12/25	10/21/25	2	2	2	Other	1	8
Completion of Well Head	11/22/25	11/30/25	2	2	2	Bore/Drill Rigs	1	8

Table 3.3-2. Construction Scenario Details

Construction Phase	Start Date ¹	End Date ¹	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	Average Daily Vendor Trucks	Average Daily Haul Trucks	Equipment Type	#	Usage Hours per day
Paving for Well	12/01/25	12/11/25	2	2	2	Paving Equipment Roller	1 1	8 8
Treatment Building								
Site Preparation	12/12/25	12/21/25	2	2	2	Tractors/Loaders/Backhoes	1	8
Grading	12/22/25	12/31/25	2	2	2	Tractors/Loaders/Backhoes	1	8
Trenching	1/1/26	1/11/26	2	2	2	Bore/Drill Rigs	1	8
Building Construction	1/12/26	1/21/26	2	2	2	Other	1	8
Architectural Coating	1/22/26	1/31/26	2	2	2	Air Compressor	1	8
Paving	2/01/26	2/11/26	2	2	2	Paving Equipment Roller	1 1	8 8
Construction Activity in SR-173								
Site Preparation	2/12/26	2/21/26	2	2	2	Tractors/Loaders/Backhoes	1	8
Trenching	2/22/26	2/28/26	2	2	2	Tractors/Loaders/Backhoes	1	8
Paving	3/1/26	3/30/26	2	2	2	Paving Equipment Roller	1 1	8 8

Notes: SR = State Route

¹ While the exact construction start date is currently unknown, for the purposes of the analysis, it was assumed that construction would begin in May 2025. It is anticipated that actual construction activities could begin in May 2026. However, assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Emissions generated during construction and operation of the Project are subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust,³ requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the active sites

³ SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for different sources for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds 6 inches. Although SCAQMD Rule 403 requires fugitive dust control beyond watering control measures, compliance with Rule 403 is represented in CalEEMod by assuming twice daily watering of active sites.

would be watered at least two times daily, resulting in an approximately 61% reduction of fugitive dust (CalEEMod default value), to represent compliance with SCAQMD standard dust control measures in Rule 403.

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions without mitigation for both summer and winter periods are summarized in Table 3.3-3. Detailed construction model outputs are presented in Appendix A.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Unmitigated

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
Summer						
Year 1	0.45	4.00	5.87	0.01	0.38	0.24
Winter						
Year 1	0.31	3.37	4.54	0.01	0.31	0.18
Year 2	1.11	2.28	3.15	0.01	0.18	0.11
Maximum Daily Emissions	1.11	4.00	5.87	0.01	0.38	0.24
<i>SCAQMD Threshold</i>	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Appendix A.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD= South Coast Air Quality Management District
Emissions estimates include watering of the active sites two times per day per Rule 403 compliance.

As shown in Table 3.3-3, the proposed Project's maximum daily construction emissions would not exceed SCAQMD thresholds for any criteria pollutant and impacts would be less than significant.

Operations

Operation of the Project would generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from area sources, energy sources, and mobile sources, which are discussed below. Emissions from these sources were estimated based on CalEEMod default assumptions for ongoing operations of the project land use and Project-engineer-provided information. Maintenance and operation activities would include daily inspections for maintenance at the wells. For further detail on the assumptions and results of this analysis, please refer to Appendix A, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Area Sources

Area sources include emissions from consumer products, landscape equipment, and architectural coatings. The area source emissions for consumer products, landscape equipment, and architectural coatings were estimated based on CalEEMod default assumptions for ongoing operations of the Project.

Energy Sources

Energy sources include emissions associated with building electricity of the wells and treatment building. No natural gas would be used during operation of the Project. Electricity use for the Project would contribute

indirectly to criteria air pollutant emissions; however, CalEEMod does not quantify criteria air pollutants from electricity, since criteria air pollutant emissions occur at the site of the power plant, which is typically off site. The energy source emissions were estimated based on CalEEMod default assumptions for ongoing operations.

Mobile Sources

Operation of the Project would also generate criteria air pollutant emissions from mobile sources (vehicular traffic) as a result of new vehicle trips maintenance trips to and from the Project, which would result in one round trip per day. CalEEMod default emission factors representing the vehicle mix and emissions were used to estimate emissions associated with vehicular sources.

Table 3.3-4 summarizes the estimated maximum daily emissions associated with operation of the Project by source for the first year of operation. As shown, the Project’s maximum daily operational emissions of VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} would not exceed the SCAQMD’s significance thresholds. Complete details of the emissions calculations are provided in Appendix A, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Table 3.3-4. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
Summer Emissions						
Mobile	0.00	0.01	0.06	0.00	0.02	0.00
Area	0.02	0.00	0.02	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
<i>Total</i>	<i>0.02</i>	<i>0.01</i>	<i>0.08</i>	<i>0.00</i>	<i>0.02</i>	<i>0.00</i>
Winter Emissions						
Mobile	0.00	0.01	0.05	0.00	0.02	0.00
Area	0.01	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
<i>Total</i>	<i>0.02</i>	<i>0.01</i>	<i>0.05</i>	<i>0.00</i>	<i>0.02</i>	<i>0.00</i>
Maximum of Summer or Winter Emissions	0.02	0.01	0.08	0.00	0.02	0.00
<i>SCAQMD Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: SCAQMD 2023.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; <0.005 = reported value less than 0.005.

The total values may not add up exactly due to rounding.
See Appendix A for detailed results.

As shown in Table 3.3-4, Project-generated operational emissions would not exceed SCAQMD emission-based significance thresholds for any criteria pollutant.

Cumulative

As stated previously, if a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution, and, conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003). As the Project would not exceed SCAQMD project-specific thresholds during construction or operations, the Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants and impacts would be less than significant.

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

Less than Significant Impact. Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest off-site sensitive receptors to the Project site are Camp Commerce, a children's camp, located along SR-173, approximately 35 feet north of the Project boundary. However, the locations of the proposed Project features (i.e., Well Head #1, treatment building, and holding tank) are located further into the Project site, and as such, construction activities would be located further than 35 feet from the nearest sensitive receptor.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate the potential of localized air quality impacts to receptors in the immediate vicinity of a proposed Project from construction and operation; however, an operational LST analysis is not required for the Project due to no substantial on-site sources of localized emissions. For projects that disturb 5 acres or less per day, the SCAQMD *Final Localized Significance Threshold Methodology* (SCAQMD 2008a) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO₂, CO, PM₁₀, and PM_{2.5}) without performing project-specific dispersion modeling.

The LST significance thresholds for NO₂ and CO represent the allowable increase in concentrations above background levels in the vicinity of a Project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM₁₀ represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for PM_{2.5} is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the PM_{2.5} ambient air quality standards. The allowable emission rates depend on the following parameters:

1. Source-Receptor Area (SRA) in which the project is located
2. Size of the project site
3. Distance between the project site and the nearest receptor

The proposed Project site is located in SRA 37 (Central San Bernardino Mountains). The maximum number of acres disturbed on the peak day was estimated using the *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* (SCAQMD n.d.), which provides estimated acres per 8-hour per day

per piece of earth-moving equipment. Based on the SCAQMD guidance, it was estimated that the maximum acres on the Project site that would be disturbed by off-road equipment would be 1-acre per day. According to the *Final Localized Significance Threshold Methodology*, SCAQMD considers a sensitive receptor to be a location where it is possible an individual could remain for 24 hours (i.e., residence, hospital, etc.), which are appropriate for comparison to any of the pollutant LSTs. However, LSTs based on shorter averaging periods, specifically for NO₂ and CO, receptor locations also include commercial, industrial, recreational, or any other areas where persons can be situated for an hour or longer at a time (SCAQMD 2008a). As stated above, the nearest receptor (i.e., Camp Commerce, a residential and overnight camp) is located approximately 35 feet north of the Project site boundary. The minimum SCAQMD-recommended distance for analyzing LST is 25 meters (82 feet), and as such, the threshold would be for 25 meters (82 feet).

According to the *Final Localized Significance Threshold Methodology*, “off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs” (SCAQMD 2008a). Trucks and worker trips associated with the Project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets.

The maximum daily on-site emissions generated from construction of the proposed Project are presented in Table 3.3-5 and are compared to the SCAQMD LST criteria for SRA 37 to determine whether Project-generated on-site emissions would result in potential LST impacts.

Table 3.3-5. Construction Localized Significance Thresholds Analysis - Unmitigated

Year	NO _x	CO	PM ₁₀	PM _{2.5}
	Pounds per Day			
Year 1	3.51	5.30	0.21	0.19
Year 2	2.04	2.91	0.10	0.09
Maximum Daily Emissions	3.51	5.30	0.21	0.19
SCAQMD LST Criteria ¹	118.00	667.00	4.00	3.00
Threshold exceeded?	No	No	No	No

Source: Appendix A.

Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns; PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. Emissions estimates include watering of the active sites two times per day per Rule 403 compliance.

The total values may not add up exactly due to rounding.

¹ Localized significance thresholds are shown for a 1-acre disturbed area for receptor distances of 25 meters in Source-Receptor Area 37.

As shown in Table 3.3-5, proposed construction activities would not generate emissions in excess of site-specific LSTs. Localized criteria air pollutant emissions impacts would be less than significant.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO “hotspots.” CO transport is extremely limited and disperses rapidly with distance from the source. Under

certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a Project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

Title 40 of the Code of Federal Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (Hot-Spot Analysis), states that “CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site” (40 CFR 93.123). While Project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would last approximately 11 months and would not require a Project-level construction hotspot analysis.

Regarding operations, given the minimal increase in daily trips for infrequent routine maintenance, Project-related mobile emissions are not expected to contribute significantly to CO concentrations and a CO hotspot is not anticipated to occur. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. The Project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

The greatest potential for toxic air contaminant (TAC) emissions during Project construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks. Use of heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions; use of diesel trucks is also subject to an Airborne Toxics Control Measure. Since the Project would result in linear construction and construction of two wells/water treatment facility building, construction would generally proceed along the alignment, other than construction of the wells and water treatment facility building, and would not require the extensive use of heavy-duty construction equipment or diesel trucks in any one location over the duration of development, which would limit the exposure of any proximate individual sensitive receptor to TACs. Due to the relatively short period of exposure at any individual sensitive receptor, as well as the distance to the nearest sensitive receptors, TACs emitted by the Project during construction and operations would not be expected to result in concentrations causing significant health risks, which would be a less-than-significant impact.

Health Effects of Criteria Pollutants

Short-term Project construction and long-term Project operations would not exceed any significance thresholds without mitigation.

VOCs and NO_x are precursors to O₃, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of ROGs and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SCAB due to O₃ precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ CAAQS/NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single Project's emissions of O₃ precursors is speculative due to the lack of quantitative methods to assess this impact. However, the Project would not exceed the significance thresholds for VOC or NO_x; therefore, implementation of the Project would contribute minimally to regional O₃ concentrations and the associated health effects.

Health effects that result from NO₂ and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, because Project generated NO_x emissions would not exceed the significance threshold during construction or operations, the Project would not result in potential health effects associated with NO₂ and NO_x.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. Thus, the Project's CO emissions would not contribute to significant health effects associated with this pollutant.

The SCAB is designated as nonattainment for PM₁₀ under the CAAQS and nonattainment for PM_{2.5} under the NAAQS and CAAQS. Particulate matter contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing (EPA 2023b). As with O₃ and NO_x, the Project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed SCAQMD's LSTs. Accordingly, the Project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related health effects for these pollutants.

In summary, because implementation of the Project would not result in exceedances of the SCAQMD significance thresholds during construction and operation, the potential health effects associated with criteria air pollutants are considered less than significant without mitigation.

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. Based on available information, the Project is not anticipated to result in other emissions that have not been addressed under Thresholds 3.3a through 3.3c, above. As such, this analysis focuses on the potential for the Project to generate odors.

The analysis of other emissions is focused on the potential for an odor impact to occur. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the Project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The Project does not propose and would not engage in any of these activities or other potential activities that would generate substantial operational odors. Therefore, the Project would result in an odor impact that is less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on a biological resources assessment conducted by Dudek biologist Tommy Molioo on May 22, 2024, and an aquatic resources jurisdictional delineation conducted by Dudek biologist Megan Minter on September 24, 2024 (Appendix B-4). This analysis includes a review of the latest available relevant reports, maps, soil data, species distributions, and biological databases to determine those resources that have a potential to occur within the Project site and a surrounding approximately 100-foot buffer (study area). This analysis is also based on existing and potentially sensitive biological resources as depicted on Figure 3, and listed in Appendix B-1, Species Compendium, which includes an inventory of plants and wildlife detected on the study area during the biological reconnaissance. The analysis of special-status plant and wildlife species with a potential to occur on the study area is included in Appendix B-2, Potential to Occur Tables. Representative photos of the study area are included in Appendix B-3, Site Photographs. This analysis is also based on the findings of an aquatic resources delineation conducted by Dudek and documented in Appendix B-4, Aquatic Resources Delineation Report.

Prior to the field reconnaissance, Dudek queried California Department of Fish and Wildlife’s (CDFW’s) California Natural Diversity Database ([CNDDDB]; CDFW 2024b), and the California Native Plant Society’s (CNPS) Inventory of Rare and Endangered Plants (CNPS 2024) to identify special-status plant and wildlife known to occur in the U.S. Geological Survey (USGS) Harrison Mountain 7.5-minute topographic quadrangle on which the study area is located, and the surrounding eight quadrangles (San Bernardino North, Silverwood Lake, Lake Arrowhead, Butler Peak, Keller Peak, Yucaipa, Redlands, and San Bernardino South).

A biological field reconnaissance was conducted to characterize the baseline environmental conditions, including vegetation communities/land covers, and to record plants, wildlife, and habitats to determine potential biological constraints to Project implementation. During the biological reconnaissance, vegetation communities and land covers were mapped according to the CDFW List of Vegetation Alliances and Associations (CDFW 2024a), also referred to as the Natural Communities List, which is based on *A Manual of California Vegetation*, Second Edition (Sawyer et al. 2009). Dudek compiled a general inventory of plant and wildlife species detected by sight, calls, tracks, scat, or other field indicators, and determined the potential for special-status species to inhabit the study area. Additionally, Dudek conducted a preliminary investigation of the extent and distribution of jurisdictional waters of the United States regulated by the U.S. Army Corps of Engineers (USACE), jurisdictional waters of the state regulated by the Regional Water Quality Control Board (RWQCB), and CDFW jurisdictional streambeds and/or associated riparian habitat. Potential and/or historic drainages and aquatic features were investigated based on a review of U.S. Fish and Wildlife Service National Wetlands Inventory (NWI) database (USFWS 2024a), and the United States Department of Agriculture (USDA) Natural Resources Conservation Service’s Web Soil Survey (USDA 2024).

The Project site consists of predominantly undeveloped land on 2.56 acres located immediately south of SR-173, and south of Lake Arrowhead Village as shown on Figure 3, Biological Resources. The Project site is in Section 21

of Township 2 North, Range 3 West of the San Bernardino Principal Meridian (County of San Bernardino 2024a). One vegetation community was observed in the study area during the biological reconnaissance: incense cedar (*Calocedrus decurrens*) forest and woodland alliance. This community dominates the overhanging tree canopy throughout the entire Project site; however, the understory contains areas of significant disturbance such as within the limits of the degraded asphalt access road on the Project site and a cleared area in the northwest corner of the Project site. However, due to the standard minimum mapping unit of 0.10-acre for vegetation communities, and the dominance of the incense cedar overstory as viewed from aerial imaging, incense cedar was the only vegetation community mapped for the study area. No sensitive vegetation communities were observed in the study area. A total of 23 native or naturalized plant species, including 16 (70%) native and 7 (30%) non-native plant species, were observed on the study area, as well as total of 15 native bird species. No amphibians, reptiles, mammals, or invertebrates were observed on the study area during the biological reconnaissance. Additionally, no special-status plants or wildlife species were incidentally observed in the study area. A compilation of all plant and wildlife species observed is included in Appendix B-1. Species diversity is moderate due to the density of coniferous trees in a relatively undeveloped setting. The study area ranges in elevation from approximately 5,400 feet above mean sea level (AMSL) to approximately 5,600 feet AMSL. The topography on the study area is characteristic of a mountainous ridgeline, with the lowest elevation in the center of the study area and highest elevation on the western and eastern portion of the study area. Urban/developed land surrounding the study area consists of residential development and SR-173.

According to the Natural Resources Conservation Service Web Soil Survey database, the study area consists of Cedarpines-Stargazer-Urban land complex, 30-50% slopes (USDA 2024). No hydric soils occur in the study area. There are no NWI-mapped wetlands on the study area (USFWS 2024a), and there are no designated critical habitats on the study area (USFWS 2024b).

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

Less than Significant Impact with Mitigation Incorporated. Based on a site visit conducted at the Project site, no special-status plants and wildlife were observed in the study area, and no sensitive or native vegetation communities were present. Based on the results of the CNDDDB and CNPS database queries, there are 110 special-status plants and 59 special-status wildlife with recorded occurrences in the Harrison Mountain 7.5-minute U.S. Geological Survey topographic quadrangle and surrounding eight quadrangles. Of the 110 special-status plant species, 67 are not expected to occur at the Project site based on an evaluation of species ranges/elevation and known habitat preferences. A total of 31 special-status plants have a low potential to occur based on limited suitable habitat or substrate, or are listed as at least CRPR list 4 species and are not considered sensitive. Species with low to no potential to occur on site, or are CRPR list 4 species, are not considered sensitive and are not discussed further. Another 12 special-status plants have a moderate to high potential to occur, based on suitable habitat, elevation range, substrate, and recent or historic occurrence records within 5 miles of the Project site. A complete list of the special-status plant species and their potential to occur determinations are included in Appendix B-2 and those species considered sensitive with a moderate to high potential to occur are summarized in Table 3.4-1 below.

Table 3.4-1. Special-Status Plant Species with a Moderate to High Potential to Occur at the Project Site

Scientific Name	Common Name	*Status (Federal/State/CRPR)	Potential to Occur
<i>Astragalus leucolobus</i>	Big Bear Valley woollypod	None/None/1B.2	Moderate
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily	None/None/1B.2	Moderate
<i>Castilleja lasiorhyncha</i>	San Bernardino Mountains owl's-clover	None/None/1B.2	Moderate
<i>Lilium parryi</i>	lemon lily	None/None/1B.2	Moderate
<i>Monardella macrantha</i> ssp. <i>hallii</i>	Hall's monardella	None/None/1B.3	Moderate
<i>Navarretia peninsularis</i>	Baja navarretia	None/None/1B.2	Moderate
<i>Perideridia parishii</i> ssp. <i>parishii</i>	Parish's yampah	None/None/2B.2	High
<i>Scutellaria bolanderi</i> ssp. <i>austromontana</i>	southern mountains skullcap	None/None/1B.2	Moderate
<i>Sidalcea hickmanii</i> ssp. <i>parishii</i>	Parish's checkerbloom	None/SR/1B.2	Moderate
<i>Sidalcea malviflora</i> ssp. <i>dolosa</i>	Bear Valley checkerbloom	None/None/1B.2	Moderate
<i>Sphenopholis obtusata</i>	prairie wedge grass	None/None/2B.2	Moderate
<i>Symphyotrichum defoliatum</i>	San Bernardino aster	None/None/1B.2	Moderate

*Status Abbreviations:

FE = Federally listed as endangered; FT = Federally listed as threatened; SE = State listed as endangered; ST = State listed as threatened; CRPR = California Rare Plant Rank

The 12 special-status plants listed above have a moderate to high potential to occur in the undeveloped habitat on the study area outside of the on-site degraded asphalt access road and cleared area in the northwest portion of the Project site. Project-related impacts to these species could occur if they are found on site during pre-construction surveys within proposed impact areas. Project-related impacts to CRPR list 1B.2 through 3 would be considered potentially significant prior to mitigation, and as such, if rare plants are found within the Project construction limits during the rare plant survey, potential Project-related impacts could be considered significant. Therefore, implementation of Mitigation Measure (MM)-BIO-1, Pre-Construction Rare Plant Surveys, would be required to reduce impacts to less than significant through surveys to determine presence/absence prior to disturbance, as well as measures to avoid and relocate, if necessary, to avoid and minimize impacts to special-status plants. As such, with implementation of MM-BIO-1, which requires the identification, avoidance, and/or relocation of any rare plants that would be impacted by the Project, potential impacts to special-status plants would be reduced to a less than significant level.

The database review also determined that of the special-status wildlife species known to occur in the region, a majority of the species were determined to have little to no potential to occur based on an evaluation of species ranges/elevations and known habitat preferences. The remaining 13 special-status wildlife species have a moderate to high potential to occur based on suitable habitat requirements and/or recent or historic occurrence records on site or within 1 mile of the Project site. A complete list of the special-status wildlife species and their potential to occur determinations are included in Appendix B-2 and is summarized in Table 3.4-2 below.

Table 3.4-2. Special-Status Wildlife Species with a Moderate to High Potential to Occur at the Project Site

Scientific Name	Common Name	Status (Federal/State)	Potential to Occur
Reptiles			
<i>Anniella stebbinsi</i>	southern California legless lizard	None/SSC	High
<i>Charina umbratica</i>	southern rubber boa	None/ST	High
<i>Diadophis punctatus modestus</i>	San Bernardino ring-necked snake	None/None	Moderate
Birds			
<i>Accipiter cooperii</i>	Cooper's hawk	None/WL	Moderate
<i>Falco columbarius (wintering)</i>	merlin	None/WL	Moderate
<i>Haliaeetus leucocephalus (nesting & wintering)</i>	bald eagle	FPD/FP, SE	Moderate
Mammals			
<i>Antrozous pallidus</i>	pallid bat	None/SSC	Moderate
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC	Moderate
<i>Glaucomys oregonensis californicus</i>	San Bernardino flying squirrel	None/SSC	Moderate
<i>Leptonycteris yerbabuenae</i>	lesser long-nosed bat	FPD/SSC	Moderate
<i>Perognathus alticola alticolus</i>	white-eared pocket mouse	None/SSC	Moderate
<i>Puma concolor</i>	mountain lion	None/SSC	Moderate
Invertebrates			
<i>Bombus crotchii</i>	Crotch's bumble bee	None/SCE	Moderate

Source: Appendix B-2.

Note: *Status Abbreviations:

FE: Federally listed as endangered; FT: Federally listed as threatened; FPE: Federally proposed for listing as endangered; PFT: Federally proposed for listing as threatened; BCC: U.S. Fish and Wildlife Service Bird of Conservation Concern; SSC: California Species of Special Concern; FP: California Fully Protected Species; WL: California Watch List Species; SE: State listed as endangered; ST: State listed as threatened; SC: State candidate for listing as threatened or endangered; SCE: State candidate for listing as endangered; SCT: State candidate for listing as threatened

While no special-status wildlife were incidentally observed during the biological reconnaissance, if they are present during construction activities, potentially significant impacts to special-status wildlife could occur. Due to the presence of suitable habitat for various avian and mammalian special-status wildlife species, the Project's construction activities, including trenching for the proposed waterline and construction of the Project's built features, may result in direct and/or indirect impacts to special-status wildlife if they are found on site prior to or during construction. Project-related impacts to special-status wildlife species would be considered potentially significant absent mitigation. Therefore, implementation of MM-BIO-2, Special-Status Wildlife Pre-Construction Survey, and MM-BIO-3, Crotch's Bumble Bee, would be required to reduce impacts to less than significant. MM-BIO-2 requires that pre-construction surveys be conducted for special-status wildlife, and MM-BIO-3 requires that Crotch's bumble bee nesting surveys be conducted if ground-disturbing activities take place during the Queen Flight Season (February 1 through August 31). If special-status wildlife is observed inhabiting the Project's construction footprint area, additional avoidance or mitigation measures would be required, including but not limited to establishing buffer areas, moving the

species out of the Project area, and biological monitoring for special-status wildlife during construction activities, as described in MM-BIO-2 and MM-BIO-3.

Additionally, although no nesting birds were observed during the biological reconnaissance, old-growth conifers and deciduous trees within the densely vegetated habitat on the study area have the potential to support foraging and nesting opportunities for raptors and migratory birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game (CFG) Code Section 3500. Project-related impacts to nesting and migratory birds protected by the MBTA and CFG Code would result in a potentially significant impact prior to mitigation. Therefore, to avoid impacts to nesting birds, MM-BIO-4 would be required to reduce impacts to less than significant. MM-BIO-4 requires measures for nesting bird avoidance. With implementation of MM-BIO-4, potential impacts to nesting birds would be reduced to a less than significant level.

Lastly, the Project site provides suitable roosting and foraging habitat for a number of special-status bat species known to occur in the region. These species are known to forage and roost within foliage such as the conifer forest surrounding the Project site. Since the Project is not proposing to remove any trees on site, there would be no direct impact to roosting bats as there would be no loss of roosting or foraging habitat. Additionally, bats that could roost at the Project site would be accustomed to disturbance due to the ambient level of noise from the adjacent SR-173 and surrounding residential areas. Therefore, there would be no significant impact to bats and further mitigation or avoidance is not required.

MM-BIO-1 **Pre-Construction Rare Plant Surveys.** Prior to commencement of any staging, earthwork, and/or construction activities, a qualified botanist shall conduct plant surveys for the 12 special status plant species that have a moderate to high potential to occur on the Project site. A minimum of two survey passes shall be conducted within the combined blooming period for all 12 species (generally March through August). Two survey passes shall be conducted within the blooming period and prior to the start of construction to account for seasonal variations in blooming, with the second survey pass conducted within 30 days prior to construction. Surveys shall consist of walking transects within suitable habitat on and immediately adjacent to the Project's construction footprint, including staging areas. The botanist shall search for individuals or populations of special-status plants known to occur in the region. All plant species encountered during the field surveys shall be identified to subspecies or variety, if applicable, to determine sensitivity status. Local reference populations shall be checked prior to starting rare plant surveys to determine if target species are in bloom.

If target species are encountered, the qualified biologist shall record data points demarcating area of species presence and assess population numbers using a hand-held global positioning system (GPS) unit with sub-meter accuracy. These areas shall be flagged for avoidance by the Project during the construction phase, and a biological monitor may be present to ensure no impacts to target species occur. In the event target species cannot be avoided by the Project, a relocation plan shall be prepared. The relocation plan shall be prepared by a qualified biologist and submitted to the Lake Arrowhead Community Services District and/or the California Department of Fish and Wildlife (CDFW) for review and approval prior to the commencement of any staging, earthwork, and/or construction activities. The relocation plan shall outline measures to collect, salvage, and relocate target species to an appropriate off-site location for propagation or transplanting to an off-site

location that shall be conserved in perpetuity (through a deed restriction or conservation easement), and shall include post-transplantation monitoring for up to one year to document success.

MM-BIO-2 Special-Status Wildlife Pre-Construction Survey. One pre-construction clearance survey shall be conducted no more than 10 days prior to initiation of site preparation and grading activities. A qualified biologist shall walk the entire Project construction footprint to determine if any special-status wildlife are observed or detected, particularly the target wildlife species including: Southern California legless lizard, southern rubber boa, San Bernardino ring-necked snake, Cooper's hawk, merlin, bald eagle, California spotted owl, pallid bat, western mastiff bat, San Bernardino flying squirrel, lesser long-nosed bat, white-eared pocket mouse, mountain lion, Crotch's bumble bee. If special-status species are observed on site, a buffer shall be established around known locations and conduct monitoring during construction near occupied areas to ensure no Project activities result in loss or incidental take does not occur. If special-status wildlife are found, a qualified biological monitor shall be on site during construction activities to move special-status wildlife out of harm's way and temporarily halt construction, if necessary, to ensure no take occurs. If the species cannot be avoided and the impact will result in the decline of the population of the species, consultation with CDFW and/or USFWS shall be required to permit such impacts.

MM-BIO-3 Crotch's Bumble Bee. Crotch's bumble bee nesting surveys shall occur if ground-disturbing activities are scheduled to occur during the Queen Flight Season through the Colony Active Period (February 1 through August 31). Potential nesting sites should be surveyed by a permitted biologist holding an active Scientific Collecting Permit for active Crotch's bumble bee colonies either through observations of queens searching for nesting sites or by looking for concentrated bumble bee activity entering and exiting a given area. Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling) and surveyors shall wait at least 1 hour following rain. Optimal surveys are conducted when there are sunny to partly sunny skies and temperatures between 65°F and 90°F, and winds less than 8 miles per hour. Surveys may be conducted outside these weather parameters if other bees or butterflies are observed flying.

Potential nesting sites investigated by colony founding queens should be global positioning system (GPS)-marked if the queen exhibits signs of interest in the potential site (e.g., she does not emerge from the site within a few minutes and then continues to nest search). Potential nesting sites identified during the queen nest searching phase shall be evaluated later by the permitted biologist during the Colony Active Period to determine whether an active colony has been established. Potential nest sites on the Project site shall be observed for up to 5 minutes during the Colony Active Period to monitor for Crotch's bumble bees entering or exiting. If a nest site is confirmed to be occupied by Crotch's bumble bees, the location GPS coordinates shall be recorded; however, no flagging or visual marking of the nest location shall occur until just prior to and during construction.

If Crotch's bumble bee is not detected during the pre-construction surveys, no further action or mitigation shall be required. If Crotch's bumble bee is detected, the Lake

Arrowhead Community Services District (LACSD), in consultation with a qualified entomologist, shall develop a Crotch's Bumble Bee Avoidance Plan to fully avoid direct and indirect impacts to this species. The avoidance plan shall include nesting surveys, adaptive management, and success criteria. If take cannot be avoided, then an Incidental Take Permit from the California Department of Fish and Wildlife (CDFW), and subsequent mitigation shall be required to reduce the impact to a less than significant level.

If required, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the Project. Mitigation shall be accomplished either through off-site conservation or through a CDFW-approved mitigation bank. If mitigation is not purchased through a mitigation bank, and lands are conserved separately, a cost estimate shall be prepared by LACSD to estimate the initial start-up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source shall be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount shall be established by LACSD following the completion of a Project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record shall take into account all management activities to fulfill the requirements of the conservation easement(s), which are currently in review and development.

MM-BIO-4 Nesting Bird Avoidance. Construction of the Project shall avoid the avian nesting season (February – September) to reduce potential impacts to protected birds and their nests. However, in the event the Project must commence during the nesting season, a pre-construction nesting survey shall be conducted within 3 days prior to ground disturbing activities, to determine the presence/absence of nesting birds. If an active nest is found on the Project site, a qualified biologist shall establish a buffer around the nest (up to 500 feet for raptors and California spotted owl and 300 feet for songbirds) and ongoing biological monitoring during construction may be required until the nestlings have fledged and the nest is no longer active. The buffer shall be established by a qualified biologist based on the sensitivity of the species to disturbance and the proximity to Project activities. Construction activities may commence outside of the buffer under the discretion of the biologist. Once the monitoring biologist has determined the nest is no longer active, the buffer can be removed, and construction activities may continue.

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 Wildlife or U.S. Fish and Wildlife Service?*

Less than Significant Impact with Mitigation Incorporated. As depicted on Figure 3, the study area consists of undeveloped old-growth alpine-montane incense cedar coniferous forest with natural seeps that drain into a non-wetland waterway. Incense cedar forest and woodland is ranked as a S3 community by CDFW which is considered sensitive. The Project would be constructed within 0.019-acres of mapped incense cedar woodland on site. However, this vegetation community is mapped as the single dominant community on the study area due to the dense overhanging canopy, while the understory primarily consists of disturbed habitat and grasses. The 0.019-acres of impacts to incense cedar woodland would occur

primarily within previously disturbed areas within the understory of the incense cedar community and no trees would be removed by the Project.

Although no riparian scrub or woodland habitat was observed in the study area, the non-wetland water within the unnamed drainage in the ravine to the immediate east of the Project site is fed by natural mountain seeps that are all considered a natural watercourse, and potentially jurisdictional aquatic features. As such, the habitat within the drainage may be considered a sensitive riparian habitat. The formal jurisdictional aquatic resources delineation conducted for the Project determined that no hydrophytic species were present within the drainage and seeps (Appendix B-4). Dominant vegetation observed included: stinging nettle (*Urtica dioica*, FAC), poison oak (*Toxicodendron diversilobum*, FACU), California wild grape (*Vitis californica*, FACU), mugwort (*Artemisia douglasiana*, FAC), and western dogwood (*Cornus sericea*, NL) (Appendix B-2). While this habitat may be considered riparian, it is not considered an indicator of wetland habitat. Regardless, Project-related temporary impacts to riparian habitat associated with a jurisdictional feature would be considered a potentially significant impact. As currently designed, the Project would result in 0.0003-acres (2.93 linear feet) of temporary impacts through trenching for the proposed water line to riparian habitat. Impacts to riparian habitat would be mitigated through implementation of MM-BIO-5, Aquatic Resources Regulatory Permitting. MM-BIO-5 requires permitting and restoration for Project-related temporary impacts to jurisdictional aquatic resources. As such, with implementation of MM-BIO-5, impacts to riparian habitat associated with a potentially jurisdictional feature would be less than significant.

MM-BIO-5 Aquatic Resources Regulatory Permitting. Prior to any trenching or construction activities that encroaches into any jurisdictional feature on the Project site, the Lake Arrowhead Community Services District (LACSD) shall consult with the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or California Department of Fish and Wildlife (CDFW) to verify agency jurisdiction and determine the appropriate permitting and mitigation strategy to permit Project impacts to a potentially regulated feature. The LACSD shall coordinate with the USACE to determine if coverage under a Nationwide Permit would be required. Direct impacts to 0.0003-acres (2.93 linear feet) of jurisdictional non-wetland waters shall be mitigated through either the restoration of habitat upon completion of construction activities or through the purchase of off-site mitigation credits. Mitigation shall be implemented through the purchase of mitigation credits from an agency-approved mitigation bank. A minimum ratio of 1:1 for establishment or re-establishment credits shall be required for impacts to jurisdictional non-wetland waters such as the drainage on the Project site. However, the final mitigation ratio required shall be determined through consultation with the above-mentioned regulatory resource agencies during the permitting process. Finally, a standard Streambed Alteration Agreement may be required from the CDFW for impacts to CDFW waters, as well as a 401 Water Quality Certification from the RWQCB.

- 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?***

Less than Significant Impact With Mitigation Incorporated. A jurisdictional aquatic resources delineation was conducted on the Project site by Dudek in September 2024 (Appendix B-4). The results of the delineation determined that one perennial, spring-fed drainage feature considered a non-wetland water

of the U.S. and State, was observed to be present within the study area, as shown on Figure 3. This drainage originates from three separate seeps: one located within the southern portion of the Project site and two located just outside the southern boundary of the Project site. These seeps were observed to have been previously piped and used as a water supply to adjacent, now-abandoned buildings. A non-functioning and abandoned cistern was observed directly adjacent to a seep present on the eastern side of the drainage. At the time of the survey, each of these seeps had water pouring from a pipe and into the drainage which contained 1 to 2 inches of flowing water.

Based on the jurisdictional delineation and review of relevant information provided in Appendix B-4, approximately 0.06-acre (1,069 linear feet) of non-wetland waters potentially regulated by USACE were delineated within the study area. All features, ephemeral and intermittent, within the study area may be regulated by USACE given their downstream connection to a traditional navigable water (Lake Arrowhead) which is presumed to be under the jurisdiction of USACE. These features may also be regulated by RWQCB and CDFW. In addition, RWQCB may regulate swales, and CDFW may regulate streambeds beyond the Ordinary High Water Mark (OHWM) to top of bank and associated riparian habitat and swales. In total, approximately 0.06-acre of non-wetland waters (below the OHWM), culverts, and swales fall under RWQCB jurisdiction, and approximately 0.10-acre of CDFW streambed (below and above the OHWM, to top of bank) occurs in the study area.

As designed, the Project would result in a total of approximately 0.0003-acre (2.93 linear feet) of temporary impacts to a seep that feeds into the drainage due to proposed Project construction activities (open trenching for installation of the proposed waterline). These proposed impacts to a potentially regulated feature would be considered potentially significant prior to implementation of mitigation. Therefore, implementation of MM-BIO-5, Aquatic Resources Regulatory Permitting, would reduce Project impacts to a less than significant level through regulatory agency permitting and compensatory mitigation. As such, with implementation of MM-BIO-5, impacts to regulated waters would be less than significant.

Additionally, in order to reduce potential indirect impacts to the drainage feature within the adjacent ravine, the Project is also required to adhere to standard stormwater Best Management Practices (BMPs) as part of the Project's required Stormwater Pollution Prevention Plan (SWPPP) during all construction-related activities to prevent short term indirect impacts to protected waters caused by ground disturbing activities (i.e., runoff, sedimentation, dust accumulation, etc.). Therefore, implementation of the Project is anticipated to have less than significant impact on protected waters and wetlands, with mitigation incorporated.

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. The Project site does not occur within any local or regionally designated or mapped wildlife corridors or habitat linkages, nor does it provide opportunities for wildlife movement through the Project site to larger habitat blocks in the region, such as Lake Arrowhead to the north (County of San Bernardino 2007). The Project site is also not designated as Open Space by the County of San Bernardino Land Use Map (County of San Bernardino 2024a). On a local scale, the Project site consists of contiguous coniferous forest habitat in a small valley along a ridgeline with continuing natural habitat to the north and south which small to medium sized mammals may use to travel locally. Existing hindrances to wildlife movement in the area include SR-173 along the northern Project boundary and SR-18 located 0.55-mile south of the Project boundary that supports moderate traffic volume that could prevent wildlife

from using the Project site for local or regional movement northwards. In addition, SR-18 would also prevent wildlife from using the Project site for local or regional movement southwards. Further, existing residential developments to the northwest and northeast of the Project site boundary serve as additional habitat barriers that prevent wildlife species from dispersing across the study area into Lake Arrowhead north. Lastly, the construction and operational requirements of the Project are minimal, and the Project would not create a physical barrier to wildlife that could move through the Project site. The construction phase of the Project could result in a temporary displacement of local wildlife in the area due to increased human presence and construction noise. However, this potential temporary displacement during construction would not be considered significant as the construction requirements are minimal and wildlife in the area would be allowed to continue to move through the area in adjacent undeveloped areas. Therefore, the Project site does not function as a wildlife corridor or linkage, and construction activities would result in a less than significant impact to wildlife corridors or linkages or impede regional wildlife movement.

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

Less Than Significant Impact with Mitigation. The Lake Arrowhead Community Plan's Conservation Chapter, Natural Resources Section, details the local goals and policies protecting biological resources within Lake Arrowhead (County of San Bernardino 2007). Goal "LA/CO2: Maintain the health and vigor of the forest environment", is applicable to the Project. As currently designed, the Project complies with all applicable regional and local goals and policies protecting biological resources. No native trees are anticipated to be removed and the Project would be constructed primarily within previously disturbed areas, which meets Goal LA/CO2 of the Lake Arrowhead Community Plan's Conservation Chapter.

Native trees, including incense cedar, are present within the Project site but are not proposed for removal. While no trees are anticipated to be removed with implementation of the Project, there is potential for trenching activities to result in impacts to the root zone of the mature incense cedar woodland and trees that are adjacent to the existing access road on-site. Trenching with heavy machinery may result in impacts to roots that encroach into the proposed trench alignment. Although trenching activities are temporary in nature, the impacts could be considered permanent if substantial damage to root zones occur that result in death of trees. While the general alignment of the proposed Project features is defined, as the exact alignment of the Project has not yet been determined, MM-BIO-6, Tree Protection Measures, would be implemented to ensure that impacts to regulated trees from construction activities would be less than significant. Implementation of MM-BIO-6 requires tree protection measures during construction activities to ensure impacts to tree roots would be less than significant. As such, with implementation of MM-BIO-6, impacts to trees and the root zones of incense cedar trees with implementation of the Project would be less than significant.

MM-BIO-6 Tree Protection Measures. Prior to any construction activity, the Lake Arrowhead Community Services District (LACSD) shall retain an International Society of Arboriculture (ISA) certified arborist to conduct and/or oversee the following activities:

1. An arborist report/tree survey shall be conducted by a certified arborist and submitted to LACSD for review and approval. The report/survey shall identify all native tree species that are anticipated to be impacted by construction activities (i.e., within 15 feet of construction activities).

2. All native trees with a six inch or greater stem diameter or 19 inches in circumference measured 4.5 feet above natural grade level (located within 15 feet or outside of the tree dripline, whichever is larger) shall be temporarily fenced with chain link or other material satisfactory to the certified arborist throughout construction activities. The fencing shall be 4-feet-tall and staked at every 6 feet. The fenced area should be considered the tree protection zone (TPZ). The TPZ fencing may be temporarily removed if required for construction activity, under the supervision of a certified arborist.
3. A pre-construction meeting shall be held between all contractors and the certified arborist. The certified arborist shall instruct the contractors on tree protection practices. This training shall include information on the location and marking of the protected trees, and the necessity of preventing damage.
4. During construction activities, the following required measures shall be included in the contractor's contract and specifications:
 - a. All heavy construction equipment and vehicles shall stay out of the fenced TPZ, unless where approved and under the supervision of a certified arborist.
 - b. Vehicle or construction equipment, supplies and materials (including paint, lumber, concrete overflow, etc.), shall not be stored, parked, or discarded within the TPZ. The duff, mulch, chips, and leaves around the TPZ shall be retained for water retention and nutrients.
 - c. Grade changes, including adding fill, shall be conducted under the supervision of a certified arborist, and feasible recommendations to minimize impacts within the TPZ shall be implemented.
 - d. Above ground tree parts within the TPZ that could be damaged (e.g., low limbs, trunks) shall be flagged with red ribbon. If contact with the tree branches or crown are unavoidable, prune the conflicting branch(es) using ISA standards under the supervision of a certified arborist.
 - e. Where trenching is necessary in areas that contain tree roots, roots shall be pruned using a Dosko root pruner or equivalent. All cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. The trench shall be made no deeper than necessary.
 - f. Trees that have been substantially root-pruned (30% or more of their root zone) shall require irrigation for the first 12 months. The first irrigation shall be within 48 hours of root pruning. Affected trees shall be deep watered every 2 to 4 weeks during the summer and once a month during the winter (adjusted accordingly with rainfall). One irrigation cycle shall thoroughly soak the root zones of the trees to a depth of 3 feet. The soil should dry out between watering; avoid keeping consistently wet soil. Irrigation is best accomplished by installing a temporary above ground micro-spray system that will distribute water slowly (to avoid runoff) and evenly throughout the fenced protection zone but never soaking the area located within 6 feet of the tree trunk, especially during warmer months. Documentation of all irrigation shall be maintained.
 - g. Upon completion of construction activities, the following shall be conducted:
 - TPZ fencing shall be removed and the following measures shall be performed:

- A 4-inch mulch layer shall be provided under the canopy of trees within the tree TPZ. Mulch should include clean, organic mulch that will provide long-term soil conditioning, soil moisture retention, and soil temperature control.
5. All native trees with a six inch or greater stem diameter or 19 inches in circumference measured 4.5 feet above natural grade level (located within 15 feet or outside of the tree dripline, whichever is larger) that were impacted during construction within the TPZ shall be monitored by an ISA certified arborist for the first 5 years after construction completion. The certified arborist shall submit an annual report, photograph each tree with substantial root pruning and compare tree health and condition to the original, pre-construction baseline. Any tree death that occurs during construction or during this 5 year monitoring period shall be replaced with at a minimum of 1:1 replacement, to be determined in consultation with a certified arborist in accordance to appropriate factors, such as tree maturity and species.

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 Project site is not located within the jurisdiction of any approved, in process, or implementing Habitat Conservation Plan or Natural Community Conservation Plans for local or regional protection of species and habitats. As such, the Project would result in no impact to regional habitat conservation plans would occur from construction of the Project, and no mitigation is required.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The evaluation of potential impacts on cultural resources is based on a Cultural Resources Inventory Letter Report prepared for the Project by Dudek in 2024 (Appendix C). The inventory effort included a California Historical Resources Information System database records search conducted at the South Central Coastal Information Center (SCCIC), a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF), archival research, and a cultural resources pedestrian survey of the Project site.

Records Search

The SCCIC records search included a review of all previously recorded investigations and cultural resources within a 1-mile radius of the Project site. Overall, the records search indicates that 33 cultural resources have been previously recorded within 1 mile of the Project site, one of which is directly adjacent to, but outside of, the Project site boundaries (i.e. P-36-012767). P-36-012767 was first recorded in 2005 and is characterized as a historic-era archaeological resource that consists of three foundations with driveways, retaining walls, and an associated historic-era refuse scatter. This resource has not been evaluated for its significance under CEQA or eligibly for inclusion in the California Register of Historical Resources (CRHR) or the National Register of Historic Places (NRHP).

NAHC SLF Search and Tribal Correspondence

A NAHC search of the SLF was requested for the Project site and 1-mile radius on February 15, 2024. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on February 20, 2024, stating that the SLF search was completed with positive results. Positive results indicate the presence of Native American cultural resources within 1 mile of the Project site, and not necessarily directly within the Project site. The NAHC additionally provided a list of nine Native American individuals and/or tribal organizations that should be contacted for more information on potential tribal sensitivities regarding the Project.

Tribal outreach letters were mailed on March 1, 2024, to all California Native American tribal representatives included on the NAHC contact list. These letters attempted to solicit additional information relating to Native American cultural resources that may be impacted by the Project. Native American tribal representatives were requested to define a general area where known resources intersect the Project site. To date, two responses have been received from this information request. These responses are paraphrased below:

Xitlaly Madrigal of the Agua Caliente Band of Cahuilla Indians (Agua Caliente) responded on March 3, 2024. Ms. Madrigal's response indicated that, after a records check of the Tribal Historic Preservation Office's cultural registry, the Project site is not located within the boundaries Agua Caliente consider their Traditional Use Area. Ms. Madrigal also stated that Agua Caliente defer consultation efforts to other tribes in this area and that her letter serves as Agua Caliente's conclusion of consultation on the Project.

Eunice Ambriz of the Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians) responded on March 11, 2024. Mr. Ambriz's response indicated that the Project site is considered moderately culturally sensitive by the Yuhaaviatam of San Manuel Nation (Yuhaaviatam), and that Yuhaaviatam wish to engage with LACSD in government-to-government consultation pursuant to Assembly Bill (AB) 52.

Archival Research

Historic topographic maps and aerial photographs were reviewed to understand the development of the Project site and surrounding areas over time. Historic aerial photographs (historic aerials) of the Project site are available from 1938 to 2020 (NETR 2024). The first available historic aerial from 1938 shows SR-173 near the northern portion of the Project site, while the remainder of the Project site appears covered in tree canopy. Overall, the tree canopy obstructs the identification of any significant changes to the Project site through the years. Due to this, the historic aerials reveal little information regarding the level of ground disturbance, the historic land use, and the development of the Project site and immediate surroundings over time.

Historic topographic maps (historic topos) of the Project site are available for the years of 1899 to 1996 (USGS 2024). The first available historic topo from 1899 shows the Project site within an undeveloped mountainous area of San Bernardino County characterized by moderately steep slopes in hilly terrain. There is little change in the historic depiction of the Project site as evidenced by the historic topos until 1953. By 1953, SR-173 appears adjacent to the northern portion of the Project site, as do two structures shown directly adjacent to the central and southern portions of the Project site. By 1967, the on-site degraded asphalt access road within the Project site is visible, along with six additional structures located immediately south, but ultimately outside of, the Project site, and within the vicinity of the currently proposed Wellhead #2. There is little change in the depiction of the Project site as evidenced by the historic topos from 1967 to the last available from 1996 (USGS 2024).

As evidenced by this archival review, it appears that the Project site has been subject to past disturbances associated with the development of a paved roadway over the first half of the 20th Century. Several structures that appear adjacent to the Project site starting in 1953 are likely associated with the former Camp Kadiman, which operated within APN 0335-141-06-0000 over the mid-20th Century. Overall, there is one structure historic in age (SR-173) located near the Project site.

Review of Geotechnical Evaluation

A geotechnical evaluation in support of the Project was conducted by Hilltop Geotechnical, Inc. in 2024. Subsurface exploration consisted of the excavation and logging of five (5) exploratory hand auger borings throughout the Project site to a maximum depth of 12.5 feet below ground surface. Three boring samples were taken adjacent to the location of Wellhead #1 and associated Project components (B-3, B-4, and B-5), and the other two were taken adjacent to Wellhead #2 (B-1 and B-2) (Hilltop Geotechnical, Inc. 2024).

Overall, materials encountered during subsurface explorations consisted artificial fill, colluvium, and Cretaceous monzogranite bedrock materials of the City Creek formation. Artificial fill was encountered in four of the five borings to a depth of approximately 6 feet below ground surface. Artificial fill generally consisted of brown, slightly moist, fine to medium grained silty sand. Colluvium was also encountered in four of five borings and reached a depth of approximately 12.5 feet below ground surface. Colluvium generally consisted of brown, moist, medium to fine grained silty sand with trace amounts of gravel. Monzogranite bedrock of the City Creek formation was encountered underlying colluvium in one of the borings. The bedrock was generally weathered near the contact with colluvial soils and became hard with depth (Hilltop Geotechnical, Inc. 2024). Overall, the Project site is underlain by artificial fill, colluvium and bedrock at varying levels of depth. In general, deposits of this nature have a low potential to contain intact subsurface cultural deposits.

Pedestrian Survey

Dudek cultural resources specialists conducted an intensive-level cultural resources pedestrian survey of the Project site on May 22, 2024. Standard procedures and techniques consistent with the Secretary of the Interior Standards for Archaeology and Historic Preservation were employed during the pedestrian survey. When possible, 10-meter interval survey transects were conducted and oriented in cardinal direction. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. This effort also entailed surveying the Project site for historic-era built

environment resources. All fieldwork was documented using field notes and an Apple iPad equipped with ESRI Field Maps. Location-specific photographs were taken using an eighth-generation Apple iPad equipped with an eight (8) mega-pixel (MP) 1080p resolution camera and georeferenced PDF maps of the Project site.

The alignment of the proposed Project features (i.e., water line and locations of Wellhead #1 and 2, treatment building and holding tank) is largely disturbed, consisting predominantly of a degraded asphalt access road where the waterline is proposed, and two unpaved/disturbed areas where Wellhead #1 and associated components, and Wellhead #2 are proposed. Portions of the Project site adjacent to the on-site road and within the proposed locations of Wellheads #1 and #2 were subject to systematic transects (40%). A reconnaissance-level pedestrian survey was conducted for the remainder of the Project site (60%) and included all portions of the proposed waterline alignment through the access road, and off-site, within SR-173.

Ground visibility throughout the Project site and associated off-site impact areas was poor (0-25%) and largely obscured by hardscape (gravel paving and asphalt), dense vegetation, and leaf litter. Vegetation throughout the Project site included wild grape (*Vitis sp.*), cypress (*Cupressus sp.*), miner's lettuce (*Claytonia perfoliata*), and dogwood (*Cornus sp.*). Observed soils consisted of brown silts and clays. Fragmentary pieces of concrete and cement, brick, and asphalt in secondary contexts were observed throughout the Project site, and particularly within the location of the graded pad for Wellhead #1 and associated Project components.

Previously recorded historic-era archaeological resource P-36-012767 was revisited during the pedestrian survey. Disturbances noted in 2024 include mass grading directly adjacent to the resource, upslope and downslope erosion of the resource, and the partial burial of its many features first recorded in 2005. Overall, no cultural resources (including archaeological components associated with P-36-012767) were identified within the Project site during the pedestrian survey.

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

No Impact. As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a “historical resource” is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places or CRHR, has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code Section 21084.1; 14 CCR 15064.5[b]). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1[q]), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (California Public Resources Code Section 21084.1; 14 CCR 15064.5[a]).

The SCCIC records search identified no previously recorded cultural resources within the Project site, although one resource, P-36-012767, was recorded as adjacent to the Project site. This resource has not been evaluated for its significance under CEQA or eligible for inclusion in the CRHR or the NRHP. An NAHC SLF search was also requested for the Project, and results were positive for Native American cultural resources within 1 mile of the Project site.

A 2024 pedestrian survey did not identify any cultural resources, including archaeological components associated with P-36-012767, within the Project site. The pedestrian survey supplemented with archival

research also revealed that the majority of the Project site is characterized by moderately steep slopes and has been disturbed in the past by roadway development, grading activities, and other disturbances associated with the construction and demolition of several structures associated the former Camp Kadiman. Geotechnical investigations in support of the Project also revealed that the Project site is underlain by artificial fill and colluvial soils. These soils represent secondary contexts, which are generally not suited to support the presence of intact archaeological deposits.

An analysis was conducted to assess the potential impacts from the construction and operation of the Project on historic-era built environment resources. The following text provides a review of the Project components and an examination of the historic-era structures located within the Project's development footprint.

The Project's components fall into three categories: not visible underground components; components that will not sustain impacts due to the construction of the Project; and historic-era resources that may be impacted due to Project construction or implementation and therefore require recordation and evaluation.

Archival research indicates that there are no historic era-built environment resources (over 45 years old) located within the Project site that require inventory or evaluation under CEQA (Appendix C).

SR-173, and the existing off-site gas line and water line (as shown on Figure 2), are the only historic-era built environment structures over 45 years old within the development footprint of the Project, and are located off-site and north of the Project site. The existing off-site gas and water lines are considered not visible, as they are underground components. Due to inaccessibility of these underground resources, they were not surveyed. SR-173, while visible, would not sustain significant impacts due to the construction of the Project, as Project improvements (i.e., trenching for water line connections and repaving activities) are in line with routine maintenance activities commonly associated with underground engineering structures and roads. These types of routine maintenance activities do not constitute a potential substantial adverse change to CEQA historical resources, and therefore, no further inventory or evaluation efforts for these resources is required under CEQA. As such, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and no impact would occur.

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

Less than Significant Impact with Mitigation Incorporated.

Though the Project would not have any impacts on known cultural resources, there is a potential for the unanticipated discovery of subsurface archaeological resources during Project implementation.

If unknown archaeological resources possessing the characteristics outlined in CEQA as significant exist, and are inadvertently encountered during implementation (i.e., construction) of the Project, there is potential for a substantial adverse change in the significance of an archaeological resource to occur. Therefore, this would result in a potentially significant impact regarding a substantial adverse change in the significance of an unknown archaeological resource pursuant to CEQA Guidelines Section 15064.5. As such, the MM-CUL-1, Unanticipated Discovery of Archaeological Resources, is required to address impacts related to the unanticipated discovery of archaeological resources during construction. MM-CUL-1 sets forth

requirements for the treatment of inadvertently discovered archaeological resources until a qualified archaeologist can assess and evaluate the discovery pursuant to CEQA. With implementation of MM-CUL-1, potentially significant impacts to unknown archaeological resources would be reduced to less than significant with mitigation incorporated.

MM-CUL-1 **Unanticipated Discovery of Archaeological Resources.** Approved construction limits shall be clearly delineated and marked prior to the start of construction activities using staking, flagging or other acceptable methods and maintained throughout the construction period. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas, or use existing paths of travel, but should be redirected a safe distance from the find. Should it be required, temporary flagging shall be installed around the resource to avoid any disturbance from construction equipment. Avoidance and/or preservation in place should be considered the preferred management approach wherever possible. If the new discovery is evaluated and found to be significant under the California Environmental Quality Act and avoidance is not feasible, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, may be warranted prior to allowing construction to proceed in this area. These measures shall be implemented by a qualified archaeologist in coordination with the Lake Arrowhead Community Services District (LACSD) and interested consulting tribe(s) (Tribes), as applicable. Ground disturbance can continue only after the resources has been properly mitigated with approval by LACSD.

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

Less than Significant Impact with Mitigation Incorporated. No prehistoric or historic-era burials, including those interred outside of formal cemeteries, were identified within the Project site as a result of the SCCIC records search, NAHC SLF search, archival research, and pedestrian survey (Appendix C). Based on the nature of the construction activities proposed for the Project (primarily open trenching within highly disturbed contexts), the likelihood of disturbing human remains is low. However, the possibility of encountering human remains within the Project site exists. In the event that human remains are inadvertently encountered during Project construction activities, impacts to these resources would be potentially significant.

Thus, mitigation is required to address impacts related to the unanticipated discovery of human remains, as outlined in MM-CUL-2, Unanticipated Discovery of Human Remains. Adherence to MM-CUL-2 would ensure that impacts to human remains resulting from the Project would be less than significant with mitigation incorporated.

MM-CUL-2 **Unanticipated Discovery of Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be,

Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendent (MLD) from the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with the Lake Arrowhead Community Services District, of the human remains.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less than Significant Impact. Project implementation would result in energy use for construction and operation.

Electricity

Electricity consumed during Project construction and operations would vary throughout the construction period based on the construction activities being performed. Various activities may require electricity, including conveying water that would be used for dust control (supply and conveyance), powering any necessary lighting or electronic equipment, or other activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction or operational maintenance activities. Therefore, the use of electricity during Project construction and operations would not be wasteful, inefficient, or unnecessary.

Natural Gas

Natural gas use is not anticipated during construction or operational maintenance activities. Equipment and vehicles would be powered by petroleum-based fuels as discussed below. Therefore, the use of natural gas during Project construction and operations would not be wasteful, inefficient, or unnecessary.

Petroleum-Based Fuels

Construction of the Project would consume energy resources as a result of the use of heavy-duty construction equipment, on-road delivery and haul trucks, and workers commuting to and from the Project site. Petroleum emissions associated with the use of construction equipment and vehicles, which were used to calculate gallons of petroleum consumed, were calculated using CalEEMod and are provided in Appendix A. Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per MT CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO₂ per gallon (The Climate Registry 2023). The estimated fuel usage from construction of the Project is shown in Table 3.6-1.

Table 3.6-1. Total Proposed Project Construction Petroleum Demand

Scenario	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
	Gallons			
Project Construction	3,795	1,505	672	331
Total Petroleum Consumed during Project Construction				6,303

Source: Appendix A.

In summary, construction associated with the development of the Project is estimated to consume a total of approximately 6,303 gallons of petroleum. Notably, the Project would be subject to CARB’s In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Fuel energy consumed during construction would be temporary in nature and would not represent significant demand on energy resources. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than comparable equipment at construction sites in other parts of the State. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

For long-term operations, the Project would require 304 gallons of gasoline and 10 gallons of diesel consumed for daily maintenance trips. The Project would require 187,104 kilowatt-hours per year of electrical consumption, and no natural gas consumption. For context, in 2022, agriculture and water pump electricity demand for Southern California Edison was approximately 3,150 gigawatt-hours (CEC 2024), and as such, the Project would result in 0.0032% of this estimated demand. Therefore, although the Project would result in a slight increase in overall electrical usage compared to existing conditions, energy used in the operation of the Project would enable the development of local water resources that would reduce the need to use more energy-intensive imported water. Overall, while construction and operational activities would consume petroleum-based fuels, consumption of such resources would be typical of construction

Projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. Therefore, because petroleum use during Project construction would be intermittent and minimal and would not be wasteful or inefficient, impacts are determined to be less than significant.

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

No Impact. As discussed in Section 3.6(a), the proposed Project would not result in wasteful, inefficient, and unnecessary consumption of energy during construction or operation. Petroleum use during construction would be minimal and temporary. Petroleum use during operational maintenance activities would be infrequent (one maintenance trip per day) and less than during construction. Although the Project would result in an increase in fossil fuels and electrical use for groundwater well pumping, the Project would be implemented to maintain source capacity for potable water for LACSD’s service area. As this would leverage local groundwater, and would therefore not require importing of groundwater, which is much more energy intensive, this would increase conservation, efficiency, and sustainability of attaining potable water. Based on the above considerations, no impacts associated with the potential of the Project to conflict with a state or local renewable energy or energy efficiency plan would occur.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is primarily based on the Report of Preliminary Geotechnical/Geologic Study for the Proposed Two Well Head Houses, an Above-Ground Treatment Building with a Water Tank and Appurtenances, APN 0335-141-06 Off State Highway 173 Lake Arrowhead Report, prepared by Hilltop Geotechnical, Inc, dated September 20, 2024, This is included as Appendix D-1 to this IS/MND. Additionally, this section is informed by Appendix D-2, Confidential Vertebrate Paleontology Records Search.

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

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

No Impact. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone or on an active fault (DOC 2024). The nearest fault is the Mill Creek Fault located approximately 6.3 miles to the southwest. As such, no impact would occur related to rupture of a known earthquake fault.

ii) Strong seismic ground shaking?

No Impact. As stated above, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone or on an active fault (DOC 2024). However, the Project site is in the tectonically active San Bernardino Mountains. The potential for strong ground shaking is an existing seismic hazard that affects the Project site, and the Project would not exacerbate this condition. However, the proposed wells would include a cement grout annular seal that would be installed in the annular space between the borehole wall and the well casing (annulus); one purpose of the annular seal is to ensure structural integrity of the well and conductor casing, and minimize any potential impact associated with an earthquake. Additionally, the Project would not involve development of habitable structures. The treatment building would be designed in compliance with applicable building code regulations. There would be no impact involving the risk of loss, injury, or death associated with seismic activity

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. According to the Countywide Plan Geologic Hazards Overlay and Appendix D-1, the Project site is not located in a zone of suspected liquefaction susceptibility (County of San Bernadino 2022; Appendix D-1). Moreover, the bedrock underneath the site is shallow. As such, seismic-related ground failure due to liquefaction would not be expected to occur on the Project site and impacts would be less than significant.

iv) Landslides?

Less than Significant Impact. The Project site and adjacent areas are relatively flat to gently sloping. According to the Countywide Plan Geologic Hazards Overlay and Appendix D-1, the Project site is located in an area of “low to moderate” landslide susceptibility (i.e., the lowest risk area) and is not in an area of mapped existing landslides (County of San Bernadino 2022; Appendix D-1). Because the Project site is flat to gently sloping, has no history of landslide activity, and is not in an area known to be particularly susceptible to landslide risk, geologic hazards associated with landslides are not anticipated to occur as a result of Project implementation. Impacts involving the risk of loss, injury, or death associated with landslides would be less than significant.

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

Less than Significant Impact. Construction of the Project would result in ground surface disturbance during grading and excavation that could create the potential for erosion to occur. Because the Project would involve construction on an area greater than 1 acre, it would require compliance with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002), which requires the preparation of and compliance with a stormwater pollution prevention plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles, protecting the perimeter of the construction site with sediment barriers, and protecting storm drain inlets.

During operation, site conditions would be generally similar to existing conditions, with the exception of the two well heads (on 36-square-foot concrete structures, each) and a small treatment building and associated paving. The presence of these areas would not increase soil erosion or the loss of topsoil on the site. Adherence to existing regulations requiring stormwater management and erosion control during construction and operations would ensure that soil erosion impacts would be less than significant.

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.

Landslides

As discussed above under Section 3.7a(iv) above and noted in the Preliminary Geotechnical/Geologic Study, the Project site is located within a designated low to moderate potential landslide area (i.e., the lowest risk area) (County of San Bernadino 2022; Appendix D-1). Additionally, the Project site is not located

within a zone of required investigation for earthquake-induced landslides (DOC 2024). There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Furthermore, field reconnaissance did not disclose the presence of older, existing landslides within or near the Project site (Appendix D-1). Therefore, the Project would not be located on a geologic unit that is unstable with respect to landslides.

Liquefaction/Lateral Spreading

The Project site is not located in an area potentially susceptible to liquefaction or lateral spreading. Potential impacts concerning liquefaction are evaluated under Section 3.7a(iii) above. Lateral spreading would occur if the event finite, lateral movement of gently sloping, saturated soil deposits caused by earthquake-induced liquefaction were to occur. Impacts associated with lateral spreading would be similar to those associated with liquefaction and would therefore be less than significant.

Subsidence

Structural distress can result from such seismic settlement due to thick loose sandy soils. However, based upon the findings of this the Preliminary Geotechnical/Geologic Study, no thick loose sandy soils underlie the Project site, and the proposed structures would be supported on engineered fill (Appendix D-1). As such, subsidence induced by a seismic event is considered less than significant.

Collapsible/Compressible Soils

The subsurface soils encountered at shallow depths on the Project site consist mostly of silty sand with trace amounts of gravel, which has very low expansivity (Appendix D-1). These types of material generally have a low to medium susceptibility to collapse when facing seasonal cycles of saturation/desiccation (Appendix D-1). Per the Preliminary Geotechnical/Geologic Study prepared for the Project, perimeter grades around the treatment building would be sloped in a manner allowing water to drain away from the structure and not pond next to the foundation (Appendix D-1). Furthermore, per the California Building Code, landscape areas within 10 feet of Project structures must slope away at gradients of at least 5% and paved areas within 10 feet of the structures must slope away at gradients of at least 2% (Appendix D-1). With incorporation of recommendations from the Preliminary Geotechnical/Geologic Study and compliance with the California Building Code requirements related to drainage and moisture content during compaction, impacts related to compressible/collapsible soils 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 are typically clay-rich soils that experience volumetric changes with changes in moisture content (i.e., they shrink when dry and swell when wet). These cyclical changes in volume over time can exert substantial pressure on foundations, resulting in structural distress and/or damage. As discussed above, and according to Appendix D-1, the subsurface soils encountered at shallow depths on the Project site consist mostly of silty sand with trace amounts of gravel, which has very low expansivity (Appendix D-1). As such, the Project would not create substantial direct or indirect risks to life or property with respect to expansive soils and impacts 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?**

No Impact. The Project would not require use of a septic tank or an alternative wastewater disposal systems. If necessary during Project construction, sanitary waste would be handled by temporary portable chemical toilets. The waste from temporary facilities would be removed by a private contractor and disposed of an approved off-site location. Furthermore, to dispose of treated wastewater discharge resulting from drilling of the wells, the Project would construct an on-site lateral to tie into an existing mainline sewer within SR-173 at the northern boundary of the Project site. No impact would occur.

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

Less than Significant Impact. Paleontological resources are the remains or traces of plants and animals that are preserved in Earth’s crust, and per the Society of Vertebrate Paleontology (SVP 2010) guidelines, are older than written history or older than approximately 5,000 years. They are limited, nonrenewable resources of scientific and educational value, which are afforded protection under state laws and regulations.

According to surficial geological mapping by Dibblee and Minch (2004) at a 1:24,000 scale, the Project site is underlain by the Cretaceous granitic rocks (mostly quartz monzonites) of the San Bernardino Mountains. Granitic rocks generally have very low to zero paleontological sensitivity.

Dudek requested a paleontological records search from the San Bernardino County Museum (SBCM) on January 26, 2024, and the results were received on April 4, 2024 (Appendix D-2). The SBCM reported no fossil localities from within the Project site; however, they have one locality, approximately 6.6 miles south/southwest of the Project site from Pleistocene sediments that are not found within the Project site.

Due to the granitic rocks underlying the Project site, impacts to paleontological resources are considered less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. Greenhouse gases (GHGs) are those that that absorb infrared radiation (i.e., trap heat) in the Earth's atmosphere. The trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere), is referred to as the "greenhouse effect," and is a natural process that contributes to the regulation of the Earth's temperature, creating a livable environment on Earth. The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. Human activities that generate and emit GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. This rise in temperature has led to large-scale changes to the Earth's system (e.g., temperature, precipitation, wind patterns), which are collectively referred to as climate change. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The primary GHGs that would be emitted by Project-related construction and operations include CO₂, CH₄, and N₂O.⁴

The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, GWP-weighted emissions are measured in metric tons of CO₂ equivalent (MT CO₂e). The current version of CalEEMod assumes that the GWP for CH₄ is 25 (so emissions of 1 MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298, based on the IPCC's Fourth Assessment Report (IPCC 2007).

Section 15064.7(c) of the CEQA Guidelines specifies that "when adopting thresholds of significance, a Lead Agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the Lead Agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the Lead Agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

As discussed in Section 3.3, the proposed Project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial

⁴ Emissions of hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride are generally associated with industrial activities, including the manufacturing of electrical components and heavy-duty air conditioning units and the insulation of electrical transmission equipment (substations, power lines, and switch gears.). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the Project would not include these activities or components and would not generate hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride in measurable quantities.

development projects as presented in its *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008b). This document, which builds on the California Air Pollution Control Officers Association’s previous guidance, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_{2e} per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2010). The 10,000 MT CO_{2e} per-year threshold, which was derived from GHG reduction targets established in Executive Order S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land-use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1.** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2.** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3.** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_{2e} per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_{2e} per year), commercial projects (1,400 MT CO_{2e} per year), and mixed-use projects (3,000 MT CO_{2e} per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_{2e} per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4.** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_{2e} per-service population for project-level analyses and 6.6 MT CO_{2e} per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5.** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

To determine the proposed Project’s potential to generate GHG emissions that would have a significant impact on the environment, its GHG emissions were compared to the SCAQMD 3,000 MT CO_{2e} per year screening threshold recommended for non-industrial Projects.⁵

Construction

Construction of the Project would result in GHG emissions, which are primarily associated with off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD recommends that “construction emissions be amortized over a 30-year Project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies” (SCAQMD 2008b). CalEEMod was used to calculate the annual GHG emissions, with detailed assumptions and results included in Appendix A. Table 3.8-1 presents the GHG emissions resulting from construction of the Project.

Table 3.8-1. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	R	CO _{2e}
	Metric Tons				
Year 1	47.38	0.00	0.00	0.02	48.36
Year 2	16.49	0.00	0.00	0.01	16.82
Total	63.88	0.00	0.00	0.03	65.18
<i>Amortized Construction Emissions (Over 30-Years)</i>					<i>2.17</i>

Source: Appendix A

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R = refrigerants; CO_{2e} = carbon dioxide equivalent. Totals may not sum due to rounding.

As shown in Table 3.8-1, the estimated total GHG emissions during construction would be approximately 65 MT CO_{2e}. Estimated Project-generated construction emissions amortized over 30 years would be approximately 2 MT CO_{2e} per year. In addition, as with Project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational Emissions

CalEEMod was used to estimate potential Project-generated operational GHG emissions from vehicular sources, area sources (i.e., landscape maintenance), electrical generation, water and wastewater, refrigerants, and solid waste. All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. In regard to long-term operations, the Project would include one round trip per day to the Project site for maintenance purposes.

⁵ LACSD understands that the 3,000 MT CO_{2e} per year threshold was proposed in 2010 and was never adopted. However, the 3,000 MT CO_{2e} per year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (SCAQMD 2008) document and subsequent Working Group meetings (latest in 2010). This threshold uses the Executive Order S-3-05 goal as the basis, so it is not tied to only the 2020 target year and is thus not outdated. This threshold is also based on the 90% capture rate methodology, which means that 90% of total emissions from all new or modified projects would be subject to some type of CEQA analysis, which was the approach taken by SCAQMD to establish the stationary/industrial source threshold, as well as by the California Air Resources Board (for interim threshold for stationary source projects) and one of the options suggested by the California Air Pollution Control Officers Association (quantitative threshold based on market capture). Further, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

The on-site Project infrastructure would consume a total of 187,104 kWh/year, as provided by the Project engineer.

Table 3.8-2, Estimated Annual Operational Greenhouse Gas Emissions, presents the annual GHG emissions associated with operation of the proposed project, which was based on CalEEMod default assumptions, except where otherwise specified. Additional details are included in Appendix A.

Table 3.8-2. Estimated Annual Operational Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
	Metric Tons				
Mobile	2.77	0.00	0.00	0.00	2.81
Area	0.01	0.00	0.00	0.00	0.01
Energy	29.38	0.00	0.00	0.00	29.55
Water	0.15	0.00	0.00	0.00	0.26
Waste	0.05	0.01	0.00	0.00	0.18
Refrigerant	0.00	0.00	0.00	0.02	0.02
<i>Proposed Project Total</i>					32.83
<i>Amortized Construction Emissions</i>					2.17
<i>Project Operations + Amortized Construction Total</i>					35.00
<i>SCAQMD threshold</i>					3,000
<i>Exceeds Threshold?</i>					No

Source: Appendix A

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R = refrigerants; CO₂e = carbon dioxide equivalent. Totals may not sum due to rounding.

As shown in Table 3.8-2, the estimated annual Project-generated GHG emissions would be approximately 33 MT CO₂e per year as a result of Project operation only. When summed with the amortized project construction emissions, the Project’s total GHG emissions would be 35 MT CO₂e per year. Annual operational GHG emissions with amortized construction emissions would be minimal and would not exceed the SCAQMD threshold of 3,000 MT CO₂e per year. Therefore, the proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and this impact would be less than significant.

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

Less than Significant Impact. Applicable plans for the Project site include SCAG’s 2024-2050 RTP/SCS and CARB’s 2017 and 2022 Scoping Plan Updates to address Senate Bill (SB) 32 and Assembly Bill (AB) 1279. Each of these plans is described below along with an analysis of the proposed Project’s potential to conflict with the related GHG emission reduction goals.

Project Consistency with SCAG’s 2024-2050 RTP/SCS

The SCAG 2024-2050 RTP/SCS is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the Southern California Region pursuant to SB 375 by achieving per-capita GHG emissions reductions relative to 2005 of 8% by 2020 and 19% by 2035 (SCAG

2024). In addition to demonstrating the region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2024-2050 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to Projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2024-2050 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

The primary objective of the RTP/SCS is to provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under SB 375. Given that the Project involves the construction, operation, and maintenance of two potable water wells and associated infrastructure, to provide additional water to LACSD, the goals and strategies of the RTP/SCS are not directly applicable. As such, the proposed Project would not conflict with the goals and policies of the RTP/SCS, and impacts would be less than significant.

Project Consistency with State Reduction Targets and CARB's Scoping Plan

The California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the proposed Project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state to achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and it was updated in 2014, 2017, and most recently in 2022. Although the Scoping Plan is not directly applicable to specific Projects, nor is it intended to be used for Project-level evaluations,⁶ it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a Project would be found to not conflict with the statutes if it met the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017); the most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022b). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates are the most applicable to the proposed Project.

⁶ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "the Scoping Plan may not be appropriate for use in determining the significance of individual Projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

The 2017 Climate Change Scoping Plan Update included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), measures to increase stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and measures to increase stringency of SB 375 targets. The 2022 Scoping Plan for Achieving Carbon Neutrality builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022b).

Several of the measures and programs included in the Scoping Plan would result in the reduction of Project-related GHG emissions with no action required at the project-level, including GHG emission reductions through a reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard) and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Given that the Project is also not anticipated to result in substantial increase in mobile trips, the Project would also not conflict with the 2017 update's goal of reducing GHG emissions through reductions in vehicle miles traveled (VMT) statewide.

The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 update to include those that capture and store carbon in addition to those that reduce anthropogenic sources of GHG emissions. The 2022 update emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the Project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Overall, the proposed Project would comply will all regulations adopted in the furtherance of the Scoping Plan to the extent applicable and required by law. As mentioned above, several Scoping Plan measures would result in reductions of Project-related GHG emissions with no action required at the Project-level, including those related to reduced fossil fuel use. As demonstrated above, the proposed Project would not conflict with CARB's 2017 or 2022 Scoping Plan updates or with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals.

Based on the preceding considerations, the proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions and impacts would be less than significant.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. The Project is intended to draw potable water from the ground, which would connect to existing water pipeline infrastructure and provide potable water to LACSD’s service area. As such, the Project would not transport, use, or dispose of hazardous materials during operation of the Project. However, earthwork and construction activities would require the use of heavy equipment and

machinery and various building materials, which would require the use of hazardous substances. Construction of the Project would involve the temporary transport, storage, and use of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oils, grease, adhesives, welding gases, solvents, and vehicle and equipment-maintenance related materials. These materials would be stored in designated construction areas within the boundaries of the Project site and the construction contractor must ensure the transport, handling, use, storage, and disposal of any hazardous materials would be in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations and laws, including but not limited to regulations set forth by the U.S. Environmental Protection Agency; U.S. Department of Transportation (Code of Federal Regulations [CFR] Title 49, Hazardous Materials Transportation Act; and Title 40 261.31, 261.21, and 261.24); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (40 CFR parts 300, 311, 355, 370, and 373); Resource Conservation and Recovery Act (40 CFR parts 240-299); Toxic Substances Control Act (40 CFR parts 745, 761 and 763); California Department of Toxic Substances Control (DTSC); Caltrans; California Division of Drinking Water (DDW); and the California Occupational Safety and Health Administration. The use of these hazardous materials for their intended purpose would not pose a significant risk to the public or environment. Many of the anticipated hazardous construction materials may be recycled and those that cannot be recycled would be transported by a licensed hazardous waste hauler and disposed of at an appropriately permitted offsite facility, in accordance with California Code of Regulations, Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste. In addition, construction would be completed in accordance with a General Construction Activity NPDES Permit (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002), which requires a SWPPP to address potential pollutants generated by the construction activities.

During well development, a sediment filtration and containment system would be installed at the Project site; this system would be used to process water for all stages of well development. The Project would be required to follow all the requirements set forth in the California Safe Drinking Water Act, California Health and Safety Code and any regulations, standards or orders adopted thereunder. All water supplied for domestic purposes shall meet all Maximum Contaminant Levels (MCLs) established by the DDW. During construction and drilling of the wells, cuttings would be generated during the borehole drilling and drilling fluids (mud) would be used to cool and lubricate the drill bit. Settlement tanks would be located on site to settle the solids from the turbid water that would be discharged during well development. Upon settlement of suspended solids in the settlement tanks, the water would be conveyed directly to the sewer, which is owned and operated by LACSD. The settled solids in the tanks (well drilling cuttings) would be hauled off by the Contractor, as necessary, during well development. During discharge of the water, water quality would be measured by the Contractor. This water quality measurement would include monitoring for chlorine, turbidity, pH, and any other requirements of LACSD.

Drill cuttings and mud could contain hazardous contaminants from contact with the groundwater. If these contaminants were not handled properly and were to be released into the environment and/or workers were exposed to these contaminants, significant impacts to the public and the environment could result. However, all drill cuttings and drilling fluids generated during the drilling of the wells would be contained, tested, and disposed of off-site by the drilling Contractor. Disposal of all materials would be required to be conducted in a legal manner per all applicable local, state, and federal regulations by the Contractor, including regulations promulgated by the Lahontan Regional Water Quality Control Board. All on-site generated waste during both construction and operation that meets hazardous waste criteria will be stored, manifested, transported, and disposed of in accordance applicable regulations and in a manner to the

satisfaction of the local Certified Unified Program Agency (CUPA), the San Bernadino County Fire Department. Waste samples from these containers would be analyzed per all local, state, and federal regulations. Based on the laboratory results, the waste would be classified as hazardous or non-hazardous and waste profiles and manifests for the waste shall be prepared. The Contractor and/or LACSD would ensure the selection of a U.S. Environmental Protection Agency-certified waste disposal facility and a licensed transporter to haul off the waste.

For the reasons discussed above, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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. All public water supply wells must be constructed in accordance with the community water system well requirements in California Department of Water Resources (DWR) Bulletins 74-81 and 74-90 and be constructed in accordance with the American Water Works Association (AWWA) Standard A100-06 for water wells. New wells must also comply with Division of Drinking Water (DDW)-specific minimum horizontal distances to sanitary hazards. The proposed wells are required to comply with Section 64560, Article 3, Water Sources, of the California Code of Regulations, which provides requirements associated with installation of new drinking water production wells and is administered by the DDW. The new well must also comply with DDW-specified minimum horizontal distances to sanitary hazards and receive approval for a waiver (per Article 1.5 of Section 64551.100, Waivers and Alternatives of the California Code of Regulations) for any alternative setback distances, if necessary. In addition, construction would be completed in accordance with a General Construction Activity NPDES Permit, which requires a SWPPP to address potential pollutants generated by the construction activities. Compliance with these regulations would ensure that the proposed wells would be properly constructed and would not result in accidental releases of contaminated water. With abandonment of the existing sewer line, the proposed well locations meet all required setbacks of the DDW and the San Bernadino County Municipal Code.

During well development, a sediment filtration and containment system would be installed at the Project site; this system would be used to process water for all stages of well development. The Project would be required to follow all the requirements set forth in the California Safe Drinking Water Act, California Health and Safety Code and any regulations, standards or orders adopted thereunder. All water supplied for domestic purposes shall meet all MCLs established by the State Division of Drinking Water.

Upon completion of construction activities, the Project would include potable groundwater generation, which would not involve the routine use or release of hazardous materials into the environment. In the unlikely event that any hazardous materials were to be accidentally released to the environment during operations, these substances would be handled in accordance with state and federal laws governing the storage, use, transport, and disposal of such materials, and would not result in a significant hazard to the public or the environment. As such, impacts related to an accidental release of these materials into the environment would be less than significant.

- 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. The Project site is not located within one-quarter mile of an existing or proposed school. The nearest schools to the Project site are Mountain High School (located approximately 0.89-mile southwest of the Project site) and Faith Lake Arrowhead Academy (located approximately 1.0 mile northeast of the Project site). Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and no impact would occur.

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

No Impact. A search of regulatory database listings of hazardous material sites (i.e., State Water Resources Control Board GeoTracker and DTSC EnvirStor) was conducted for the Project site. The database search did not indicate any listings on or near the site as a hazardous materials site compiled pursuant to Government Code Section 65962.5 that could create a hazard as a result of the Project (DTSC 2024, SWRCB 2024). The Project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, the Project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and no impact would occur.

- 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 an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the San Bernadino International Airport, located approximately 9.5 miles south of the Project site. As such, the Project would not result in a safety hazard or excessive noise for people residing or working in the area and no impact would occur.

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

Less than Significant Impact with Mitigation Incorporated. The applicable emergency response plan is the San Bernadino County Emergency Operations Plan (EOP), which includes guidance for emergency evacuation. According to the Lake Arrowhead Community Plan, the closest evacuation route to the Project site is SR-173 (County of San Bernardino 2007). During construction, SR-173 would be used to access the site. Additionally, temporary construction activities would be required in the SR-173 roadway right-of-way to connect a water pipeline extension from the Project site to an existing utility line, which would require partial lane closure. All other Project activities would occur on site. In order to reduce potential impacts related to roadway traffic in the event of an emergency evacuation, MM-TRA-1 is required, as detailed in Section 3.17, Transportation, of this Draft IS/MND. MM-TRA-1 would require preparation of a construction traffic control plan, including coordination with emergency response providers, use of appropriate signage and/or flaggers, and prior notification of property owners/residents. With implementation of MM-TRA-1, the Project would not impair implementation of or physically interfere with an adopted emergency response

plan or emergency evacuation plan. As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant with mitigation.

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

Less than Significant Impact with Mitigation Incorporated. The Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) in a State Responsibility Area as mapped by California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2024). The Project would not involve development of structures that would expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The Project would result in one maintenance trip per day to the site, and does not include habitable structures. However, during construction activities, wildfire risk may occur. As such, MM-HAZ-1 is required to ensure safeguards would be implemented to prevent accidental ignition of nearby vegetation. Compliance with MM-HAZ-1 would provide adequate safety measures to reduce wildfire risk. Additionally, the Project would be required to comply with applicable fire code provisions, including coordination with fire protection services, local fire councils, the U.S. Forest Service, and other fire agencies within the mountain community. Therefore, impacts would be less than significant with mitigation incorporated.

MM-HAZ-1 During construction, the Contractor and other on-site personnel shall keep traffic away from tree root areas, vegetation, or combustible materials to the extent feasible. No activities involving hot work would occur during high wind weather (greater than 30 miles per hour). Workers on-site shall keep any combustible materials away from any fire or ignition sources. Flammable and ignitable materials shall be kept away from fire sources, and properly stored and disposed. Fire suppression systems, such as fire extinguishers and water pumps, shall be available on-site.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is partially based on the Lake Arrowhead Community Services District Water Supply Assessment for the Highway 173 Well Site Area, prepared by KYLE Groundwater, dated September 30, 2024. This is included as Appendix E to this IS/MND.

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

Less than Significant Impact. Stormwater runoff from the Project site during construction could contribute limited amounts of pollutants to receiving waters, such as sediment, litter, and/or fuels and greases. Construction-related land disturbance, such as grading, excavation, trenching, and temporary soil stockpiling, would result in temporary disturbance of soils. Sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of construction materials could result in water quality degradation if runoff containing the sediment entered receiving waters in sufficient quantities to exceed water quality objectives. Impacts from construction-related activities would be short term.

Because implementation of the Project would collectively require construction activities resulting in land disturbance of more than 1 acre, LACSD would be required to obtain coverage under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002), which pertains to pollution from grading and Project construction. Coverage under the Construction General Permit requires a qualified individual (as defined by the State Water Resources Control Board [SWRCB]) to prepare a SWPPP to address the potential for construction-related activities to contribute to pollutants within the proposed Project’s receiving waterways. The SWPPP must describe the type, location, and function of structural measures to alleviate stormwater impacts and must demonstrate that the combination of measures selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in the Construction General Permit. Measures

developed as part of the SWPPP may include, but are not limited to, minimizing the extent of disturbed areas and duration of exposure, stabilizing and protecting disturbed areas, keeping runoff velocities low, and retaining sediment within the construction area. These measures could be achieved in part by use, as appropriate, of temporary desilting basins, silt fences, gravel bag barriers, temporary soil stabilization, temporary drainage inlet protection, and/or diversion dikes and interceptor swales. Adherence to the SWPPP would prevent construction-related contaminants from reaching impaired surface waters and contributing to impacts on water quality in the region's receiving waters.

Project operations would not involve activities such as grading or drilling that could result in significant impacts to surface water or groundwater quality. As such, the Project would not contribute additional pollutant sources to surface waters or groundwater basin. Once operational, the Project would supplement LACSD's water supply obligations to the service area and operation of the Project would be consistent with LACSD's historical use of groundwater supplies. Groundwater from the site would be pumped to the Bernina Water Treatment Plant, where it would be blended with water from Lake Arrowhead water to reduce hardness (LACSD 2024).

Regarding the treated, potable water (e.g., drinking water), drinking water standards are set under the federal Safe Drinking Water Act and the California Safe Drinking Water Act. Regulations implementing the California Safe Drinking Water Act are defined in the California Health and Safety Code and Titles 17 and 22 of the California Code of Regulations. Environmental water quality standards are set under both the Clean Water Act (federal law) and the Porter-Cologne Water Quality Control Act (state law). LACSD monitors its drinking water sources and distribution systems in accordance with California Code of Regulations, Title 22, Division 4, Chapter 15, Domestic Water Quality and Monitoring, which is administered by SWRCB's DDW. LACSD is required to monitor its groundwater sources for a wide range of constituents, including bacteriological constituents; general physical, secondary, and inorganic constituents; nitrates and nitrites; radiological constituents; and various constituents of concern.

LACSD would continue to comply with applicable regulations and the terms of its water supply permit, would continue to implement its extensive water quality monitoring activities, and would implement corrective actions where needed to ensure the continued safety and reliability of its water supply. In the event previously unidentified contaminants are detected at concentrations exceeding applicable levels, LACSD would take appropriate action, which would include notifying the DDW, increasing monitoring, and if necessary, deactivating wells until the issue can be addressed.

For the reasons discussed above, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality and 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?*

Less than Significant Impact with Mitigation Incorporated. During Project construction, minor amounts of water would be required for various uses, such as dust control. However, because of the relatively small quantity of water required in the context of available supply, no depletion of groundwater or other supplies would occur from Project construction.

As stated in Section 2.2, Environmental Setting of this IS/MND, the Project site is located on an approximately 83-acre catchment (i.e., watershed). Accounting for runoff and evapotranspiration, the resultant volume of water that is estimated to percolate as groundwater recharge is approximately 20.8 inches per year, or approximately 128,158 gallons per day (Appendix E). The watershed area has one existing operational groundwater well (i.e., Moller's Well), which is located approximately 300 feet east of the Project site boundary. As such, operation of the Project's two proposed groundwater wells may result in reduction of the existing groundwater supply located within the watershed, and consequently, Moller's Well.

Based on available information for the existing Moller's Well, the well was originally tested at an instantaneous pumping rate of 30 gallons per minute (gpm) following construction (Appendix E). However, total metered production from this well was 270,240 cubic feet over the period from July 9, 2015, through August 29, 2024, equating to approximately 605 gallons per day (gpd) extracted from the watershed, or 0.42 gpm (Appendix E).

According to Appendix E, the two proposed groundwater wells could each operate with a continuous instantaneous pumping rate of 30 gpm. As such, the total volume of water extracted from the catchment area by all three wells (i.e., the existing Moller's Well at its original instantaneous water rate and the two proposed Project wells) could conservatively be 78,365 gpd, equating to approximately 61% of water estimated to recharge the watershed (Appendix E). Furthermore, it is considered unlikely that all three wells would be continuously operational throughout any given year. Consequently, negative impacts to the watershed from additional groundwater extraction is considered unlikely (Appendix E).

However, although negative impacts to the watershed are not anticipated, without drilling and testing of the two proposed wells, specific impacts to the existing Moller's Well cannot be known. As such, the Project would result in a potentially significant impact regarding the potential to substantially decrease groundwater supplies such that the Project may impede sustainable groundwater management of the basin, and implementation of MM-HYD-1 would be required to reduce impacts to less than significant. MM-HYD-1 requires LACSD to measure and record the static water levels of the existing Moller's well to establish baseline static water level conditions, and maintenance of the baseline static water levels are required in accordance with MM-HYD-1. The requirements set forth in MM-HYD-1 would reduce potential impacts to the existing Moller's Well to a less than significant level.

As detailed in response to Threshold 3.10(ii), during operation of the Project, site conditions would generally be similar to existing conditions at the Project site, with the exception of the two well heads (on 36-square-foot concrete structures, each) and a small treatment building and associated paving. Any long-term changes in drainage patterns that would occur as a result of the Project would be limited, minimal, and a majority of the Project site would remain pervious, and as such, the Project would not result in substantial interference with groundwater recharge, and impacts would be less than significant.

For the reasons discussed above, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management, and impacts would be less than significant with implementation of MM-HYD-1.

MM-HYD-1 **Aquifer Pump Testing at Moller's Well.** Prior to extraction or testing activities of any water from the Project's proposed on-site potable water wells, the Lake Arrowhead Community Services District (LACSD) shall measure and record the static water levels of

the existing, off-site groundwater well (hereinafter referred to as “Moller’s Well”), to establish baseline static water level conditions. For the first 10 operational days of pumping activities for both on-site wells (operating simultaneously), LACSD shall conduct a 10-day constant-rate aquifer pumping test. If, during the 10-day constant-rate aquifer pumping test, water level interference (defined as groundwater level decline in Moller’s Well) is detected, then LACSD shall reduce its pumping rate of either or both Project wells to ensure Moller’s Well maintains the baseline static water level conditions originally recorded. If the results of the 10-day constant-rate aquifer pumping test determine that reductions in the maximum pumping rates of the proposed wells are necessary to maintain the static water levels at the Moller’s Well, then future exceedances of that maximum pumping rate shall be prohibited. Additionally, if the initial 10-day constant rate aquifer pumping test is conducted during the wet season (November through April), then an additional 10-day constant rate aquifer pumping test shall be conducted during the dry season (May through October) during simultaneous pumping activities of the Project wells. If LACSD determines that increases in the maximum pumping rate are appropriate and feasible, additional aquifer pumping tests shall be conducted to confirm that adjustments to the pumping rate would not recede past the baseline static water levels conditions at Moller’s Well.

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 off-site?***

Less than Significant Impact. As discussed above in Section 3.4(b), there is one perennial, spring-fed drainage located on the Project site, which may be impacted during Project construction. Construction of the Project would result in ground surface disturbance during grading, excavation, and temporary stockpiling of soil that could create the potential for erosion to occur. However, as indicated in Section 3.10(a), because the Project would involve construction on an area greater than 1 acre, it would require compliance with the General Construction Activity NPDES Permit (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002), which requires preparation of and compliance with a SWPPP. The SWPPP must include erosion control measures such as covering exposed soil stockpiles, protecting the perimeter of the construction site with sediment barriers, and protecting storm drain inlets.

During operation, site conditions would be generally similar to existing conditions, with the exception of the two well heads (on 36-square-foot concrete structures, each) and a small treatment building and associated paving. The presence of these areas would not increase substantial erosion or siltation on or off site. Adherence to existing regulations requiring stormwater management and erosion control during construction and operations would ensure that impacts related to erosion/siltation would be less than significant.

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

Less than Significant Impact. Minimal amounts of water may be used for dust control of exposed soils during construction of the Project. However, compliance with the Project-specific SWPPP that would be

required per the Construction General Permit, specifically the use of runoff control devices, would ensure that flooding on or off site would be minimized during construction.

During operation, site conditions would generally be similar to existing conditions at the Project site, with the exception of the two well heads (on 36-square-foot concrete structures, each) and a small treatment building and associated paving. Any long-term changes in drainage patterns that would occur as a result of the Project would be limited to minor, highly localized changes associated with the presence of additional structures and additional impervious surfaces on the site. The increase in impervious surfaces could cause a minor increase in peak flow rate and runoff volumes from the site. However, this Project site would maintain the general drainage pattern as it currently exists. Furthermore, the Project would comply with the San Bernadino County Low Impact Development (LID) requirements in accordance with the adopted MS4 permit (Order R8-2010-0036), which requires management of stormwater on site, including measures to capture and infiltrate stormwater into pervious surfaces. Due to required compliance with existing regulations, any minor alterations to the existing drainage pattern would result in a less than significant impact relative to surface runoff and flooding.

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. As discussed above in Section 3.10(c)(ii), proposed site conditions would be generally similar to existing conditions at the Project site. Furthermore, the addition of proposed Project facilities would not substantially change the existing drainage patterns. The moderate increase in impervious surfaces due to the Project could cause a minor increase in peak flow rate and runoff volumes from the site. However, this increase in impervious area in comparison to the size of the area served by the County's storm drain system would result in a negligible (i.e., non-measurable) effect on the capacity of the storm drain system. Nevertheless, required compliance with the County's LID standards would reduce the potential for increased runoff to occur. The LID standards require management of stormwater on site, including measures to capture and infiltrate stormwater into pervious surfaces. As a result, the Project would not 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 and impacts would be less than significant.

iv) *Impede or redirect flood flows?*

Less than Significant Impact. The Project site is not located within a 100-year or 500-year floodplain (FEMA 2024). Additionally, the Project would not substantially alter the drainage pattern at the Project site such that flows would be impeded or redirected. As such, impacts related to flood flows would be less than significant.

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

No Impact. As discussed above in Section 3.10(c)(iv), the Project site is not located within a 100-year or 500-year floodplain (FEMA 2024). According to Appendix D-1, seiching involves an enclosed body of water oscillating due to ground shaking, usually following an earthquake. Lakes and water towers are typical bodies of water affected by seiching (Appendix D-1). However, the shoreline of Lake Arrowhead is over 0.5-mile north of the Project site. As such, the Project site is not under the influence of a large body of water

and would not be affected by seiching. Finally, due to the inland geographic location of the Project site, tsunamis are not considered a hazard (Appendix D-1). Therefore, the Project would not risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone, and no impact would occur.

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

Less than Significant Impact. There is no groundwater management plan applicable to the Project site; However, the Project site is covered under the Water Quality Control Plan for the Lahontan Region (Basin Plan). Although the Project would discharge treated groundwater during construction as a result of well drilling, disposal of treated groundwater is considered a “low threat discharge” that is conditionally exempt from the Basin Plan’s discharge prohibitions (LRWQCB 2023). Other potential threats to surface water quality associated with the Project are minimal because the Project would be subject to the requirements of the Construction General Permit and a Project SWPPP during construction and would also comply with the County’s Low Impact Development standards, which require management of stormwater on site, including measures to capture and infiltrate stormwater into pervious surfaces. As such, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project physically divide an established community?*

No Impact. The Project would not physically divide an established community because there are no proposed Project features that would physically divide or block residents from accessing public areas or facilities. As such, the Project 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 Countywide Plan designates the site as LA/RS (County of San Bernardino 2024a). The Project site is zoned as LA/RS-14M (County of San Bernardino 2024a). The LA/RS zone permits single-family residential and other compatible uses, including groundwater wells. No change to the existing land use and zoning would occur. In accordance with Section 33.0631 of the Municipal Code, construction of groundwater wells requires a permit from DPH EHS. Land use plans applicable to the Project include the Countywide Plan, Lake Arrowhead Community Plan, and the Southern California Association of Governments’ 2024-2050 RTP/SCS (Connect SoCal). Neither the Lake Arrowhead Community Plan nor Connect SoCal include goals or policies related to groundwater wells (SCAG 2024; County of San Bernadino 2007). The Countywide Plan includes the following policies related to groundwater wells (County of San Bernadino 2022):

- **Policy IU-1.1, Water Supply.** We require that new development be connected to a public water system or a County-approved well to ensure a clean and resilient supply of potable water, even during cases of prolonged drought.
- **Policy HZ-3.7, Well Water Testing.** In unincorporated environmental justice focus areas that are not served by public water systems, we periodically test well water for contamination, identify potential funding sources, and, where feasible, provide technical assistance to implement necessary improvements, with particular emphasis in addressing the types of contamination identified in the Hazard Element tables.

Project would not conflict with either policy. Regarding Policy IU-1.1, the Project is not a new development project and would generate uses that would be consume water. In fact, it would facilitate new groundwater wells to supplement the LACSD’s existing water supply, thereby contributing to a resilient supply of potable water in the region. Regarding Policy HZ-3.7, the Project is not within an environmental justice focus area and would not prevent or otherwise interfere with the County’s well testing procedures in environmental justice focus areas. The Project does not propose any residential or commercial development that would result in population or employment changes. No conflict or inconsistency with local or regional plans or with the growth forecasts used in the development of these plans would occur and there would be no impact.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. According to the Department of Conservation’s Mineral Land Classification map of Southwestern San Bernardino County, the Project site is in an area classified as a Mineral Resource Zone 4 (MRZ-4). MRZ-4 are areas of no known mineral occurrences, and where geologic information does not rule out the presence or absence of significant mineral resources (DOC 1995). There are no active mining claims on the Project site and the Project would not include any mining activities or the extraction of any mineral resources. Additionally, the Project would not result in a change in land use that would preclude an area from future mineral exploration. As such, the Project would not 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 and no impact would occur.

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 Countywide Plan does not identify aggregate materials in the Lake Arrowhead community (County of San Bernardino 2022). The Project site is not identified as a location with significant or potentially significant mineral resources. Further, mining operations do not currently exist on site. As such, implementation of the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site and no impact would occur.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

Under existing conditions, most of the Project site consists of open space covered in dense evergreen forest. For the purposes of this IS/MND, the closest sensitive receptor is Camp Commerce, which is located approximately 35 feet north of the Project boundary.

The County’s Countywide Plan (i.e., General Plan) designates the site as Lake Arrowhead/Single Residential (LA/RS) (County of San Bernardino 2024). The Project site is zoned as Lake Arrowhead/Single Residential (LA/RS-14M) (County of San Bernardino 2024). The LA/RS zone permits single-family residential and other compatible uses. In accordance with Section 33.0631 of the San Bernadino County Municipal Code, construction of groundwater wells requires a permit from the San Bernardino County DPH EHS.

Represented by locations ST1, ST2, and ST3 in Table 3.13-1, the existing outdoor ambient sound environment at the Project site was sampled during a field survey conducted on May 22, 2024. Collected sample sound pressure level measurements at these locations, along with documented investigator observations regarding perceived or witnessed acoustical contributors to this baseline or pre-Project noise environment, also appear in Table 3.13-1. These locations are intended to be representative of the existing single-family homes near the Project site. Photographs, tagged survey positions, and instrument details can be found in Appendix F, Baseline Field Noise Measurement Data.

Table 3.13-1. Measured Samples of Existing Outdoor Ambient Sound Level

Survey Position	Description/Address	Time	Leq (dBA)	Lmax (dBA)	Lmin (dBA)	Notes (Perceived Sound Sources)
ST1	East of Well #1 and Proposed Treatment Building	9:21 a.m.– 9:36 a.m.	51.1	61.5	38.1	Traffic, Birdsong, Rustling Leaves
ST2	Northwest of Well #2	9:42 a.m.– 9:57 a.m.	42.8	58.8	36.6	Birdsong, Rustling Leaves, Stream
ST3	Southwest of residential buildings, east of the Project site	10:02 a.m.– 10:17 a.m.	55.1	66.4	38.2	Traffic, Birdsong, Rustling Leaves, Stream

Source: Appendix F

Notes: Leq = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; Lmax = maximum sound level during the measurement interval; Lmin = minimum sound level during the measurement interval.

The measured outdoor energy-equivalent sound level (Leq) values appearing in Table 3.13-1 range from 42.8 to 55.1 A-weighted decibels (dBA) and are consistent with expectations for the environment based on the rural nature of the Project site and the distance to major roadways, such as SR-173.

Regulatory Setting and Thresholds of Significance

Local Noise Ordinance and General Plan Guidance

As stated above, the County’s Countywide Plan (i.e., General Plan) designates the Project site as LA/RS-14M (County of San Bernardino 2024). The County’s General Plan Noise Element aims to limit the community’s exposure to noise

levels and directs construction noise levels to adhere to the FTA-based guidance of 80 dBA 8-hour L_{eq} at a noise-sensitive receptor.

Table 83-2 in Section 83.01.080 of the County's Code of Ordinances establishes a maximum exterior noise level limit at residential land uses of 55 dBA from 7:00 a.m. to 10:00 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. For mobile noise sources, Table 83-3 of the County's Code of Ordinances establishes a 60 dBA CNEL or L_{dn} exterior limit for residential land uses. Section 83.01.080 of the County's Code of Ordinances also exempts permitted construction during allowable daytime hours (7:00 a.m. to 7:00 p.m., except Sundays and Federal Holidays) from noise level regulations but does not quantify allowable construction noise levels (County of San Bernadino 2014). As detailed in Section 2.5, Project Construction and Phasing, the Project is anticipated to occur Monday through Friday between the hours of 7:30 AM and 5:00 PM, and no construction activities would be conducted on federal holidays.

Federal Guidance

Lacking quantified noise limits for construction noise at the local level, this assessment adopts the FTA-based guidance of 80 dBA 8-hour L_{eq} at a noise-sensitive receptor to determine impact significance.

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

Less than Significant Impact.

Construction

Construction of the Project would result in the temporary generation of noise at the Project site. Construction would involve the use of heavy equipment and machinery, such as loaders, bore/drill rigs, paving equipment, rollers, as detailed further in Table 3.3-2 of Section 3.3, Air Quality. Construction would generate levels of noise that can vary from hour to hour and day to day depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time. While the Project site features varying topography and dense tree canopy cover that partially blocks the line-of-sight from the nearest noise-sensitive receptor to onsite construction activities, the potential dB attenuation these site features may provide was not included in construction noise modeling to provide a worst-case scenario for predicted construction noise levels. As a result, while construction noise levels may result in an audible change to the environment, these predicted changes represent a worst-case and would be temporary.

Tables 3.13-2 through 3.13-5 present the estimated construction noise level (8-hour L_{eq}) for each anticipated phase of Project construction activity. Details of these predictions in Appendix F show the expected acoustical contribution from each type of operating construction equipment for each phase.

Table 3.13-2. Estimated Per-Phase Construction Noise Levels at Nearest Noise-Sensitive Receptor (Camp Commerce) - Well #1

Project Construction Activity / Phase	Nearest Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)*	Predicted 8-hour L_{eq} (dBA) for Nearest Distance	Exceeds 80 dBA L_{eq} FTA-based standard?
Trenching for Waterline	170	60.4	No
Site Preparation	75	70.4	No
Removal/Abandonment of Sewer	75	70.4	No
Borehole Drilling	75	73.3	No
Water Quality Sampling	75	78.3	No
Casting/Screen Installation	75	73.3	No
Annular Seal Installation	75	73.3	No
Well Development	75	73.3	No
Aquifer Testing	75	78.3	No
Disinfection	75	78.3	No
Completion of Well Head	75	73.3	No
Paving for Well	75	72.9	No

Source: Appendix F

Note: L_{eq} = energy-equivalent sound level; dBA = A-weighted decibel; FTA: Federal Transit Administration.

*Horizontal distances were conservatively measured from the property boundary of the nearest noise-sensitive-receptor to the Project property boundary. A 10-foot “buffer” was added to account for construction equipment activities occurring close to, but not on top of, the Project boundary.

The predicted aggregate noise levels for the 12 studied construction activity phases during the construction of Well #1 would be higher than the samples of baseline outdoor ambient noise levels appearing in Table 3.13-1 (at ST1) by up to 27.2 dBA and would represent an audible change to the environment, but only temporarily. Furthermore, all predicted levels are less than the 80 dBA 8-hour L_{eq} FTA-based standard.

Table 3.13-3. Estimated Per-Phase Construction Noise Levels at Nearest Noise-Sensitive Receptor (Off-site Residence to the West) - Well #2

Project Construction Activity / Phase	Nearest Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)*	Predicted 8-hour L_{eq} (dBA) for Nearest Distance	Exceeds 80 dBA L_{eq} FTA-based standard?
Trenching for Waterline	170	60.4	No
Site Preparation	500	53.5	No
Borehole Drilling	500	56.4	No
Water Quality Sampling	500	61.4	No
Casting/Screen Installation	500	56.4	No
Annular Seal Installation	500	56.4	No
Well Development	500	56.4	No

Table 3.13-3. Estimated Per-Phase Construction Noise Levels at Nearest Noise-Sensitive Receptor (Off-site Residence to the West) - Well #2

Project Construction Activity / Phase	Nearest Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)*	Predicted 8-hour L_{eq} (dBA) for Nearest Distance	Exceeds 80 dBA L_{eq} FTA-based standard?
Aquifer Testing	500	61.4	No
Disinfection	500	61.4	No
Completion of Well Head	500	56.4	No
Paving for Well	500	56.0	No

Source: Appendix F

Note: L_{eq} = energy-equivalent sound level; dBA = A-weighted decibel

*Horizontal distances were conservatively measured from the property boundary of the nearest noise-sensitive-receptor to the Project property boundary. A 10-foot “buffer” was added to account for construction equipment activities occurring close to, but not on top of, the Project boundary.

The predicted aggregate noise levels for the 11 studied construction activity phases during the construction of Well #2 would be higher than the samples of baseline outdoor ambient noise levels appearing in Table 3.13-1 (at ST2) by up to 18.6 dBA and would represent an audible change to the environment, but only temporarily. Furthermore, all predicted levels are less than the 80 dBA 8-hour L_{eq} FTA-based standard.

Table 3.13-4. Estimated Per-Phase Construction Noise Levels at Nearest Noise-Sensitive Receptor (Camp Commerce) - Treatment Building

Project Construction Activity / Phase	Nearest Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)*	Predicted 8-hour L_{eq} (dBA) for Nearest Distance	Exceeds 80 dBA L_{eq} FTA-based standard?
Site Preparation	75	70.4	No
Grading	75	70.4	No
Trenching	75	73.3	No
Building Construction	75	78.3	No
Architectural Coating	75	70.4	No
Paving	75	72.9	No

Source: Appendix F

Note: L_{eq} = energy-equivalent sound level; dBA = A-weighted decibel

*Horizontal distances were conservatively measured from the property boundary of the nearest noise-sensitive receptor to the Project property boundary. A 10-foot “buffer” was added to account for construction equipment activities occurring close to, but not on top of, the Project boundary.

The predicted aggregate noise levels for the six studied construction activity phases during the construction of the treatment building would be higher by up to 27.2 dBA than the samples of baseline outdoor ambient noise levels appearing in Table 3.13-1 (at ST1) and would represent an audible change to the environment, but only temporarily. Furthermore, all predicted levels are less than the 80 dBA 8-hour L_{eq} FTA-based standard.

Table 3.13-5. Estimated Per-Phase Construction Noise Levels at Nearest Noise-Sensitive Receptor (Camp Commerce) - SR-173

Project Construction Activity / Phase	Nearest Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)*	Predicted 8-hour L_{eq} (dBA) for Nearest Distance	Exceeds 80 dBA L_{eq} FTA-based standard?
Site Preparation	50	73.9	No
Grading	50	73.9	No
Paving	50	76.4	No

Source: Appendix F

Note: L_{eq} = energy-equivalent sound level; dBA = A-weighted decibel

*Horizontal distances were conservatively measured from the property boundary of the nearest noise-sensitive-receptor to the Project property boundary. A 10-foot “buffer” was added to account for construction equipment activities occurring close to, but not on top of, the Project boundary.

The predicted aggregate noise levels for the three studied construction activity phases during the construction of the treatment building would be higher than the samples of baseline outdoor ambient noise levels appearing in Table 3.13-1 (at ST1) by up to 25.3 dBA and would represent an audible change to the environment, but only temporarily.

Furthermore, all predicted construction noise levels during the construction on SR-173, as well as Well #1, Well #2, and the Treatment Building, are less than the 80 dBA 8-hour L_{eq} FTA-based standard. As such, the Project would result in a less-than-significant impact regarding the generation of a substantial temporary 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.

Operation

Once construction has been completed, a few small structures would be located on-site, including a treatment building, holding tank, and two 6-foot-wide by 6-foot-length by 5-foot-tall concrete vaults at the locations of Well Heads #1 and #2. On-site potable water wells would be operational for 24 hours per day in order to supply potable water. According to Section 2.4 of this document (under the heading “Well Pump and Motor Installation Activities”), on-site features once the Project is operational would include submersible pumps for each well. Because these pumps are submersible/enclosed within 6-foot-wide by 6-foot-length by 5-foot-tall concrete vaults, the resulting operational noise levels would be attenuated to negligible levels when traveling from below- to above-grade within such concrete vaults. On this basis and compared to the measurement samples of L_{eq} presented in Table 3.13-1, Project operation noise is anticipated to be less than the existing outdoor ambient level at the nearest existing homes, and thereby comply with the set ambient base noise levels per the County’s Code of Ordinances.

Additionally, roadway traffic noise impacts associated with the Project once operational are expected to be negligible. One worker round trip will be required each day to check the Project’s operational integrity, and more than one worker trip would happen infrequently. Caltrans traffic census data estimates an annual average daily traffic (AADT) volume of 8,700 vehicles along SR-173 at CA-189, which, in comparison to one daily worker round trip, further suggests that roadway traffic noise level increases associated with the Project would be negligible when compared to levels associated with existing traffic volumes (Caltrans 2021).

For these multiple reasons, under the County’s maximum exterior noise level limit of 55 dBA from 7:00 a.m. to 10:00 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. and 60 dBA CNEL or L_{dn} exterior limit at residential land uses for mobile sources, enduring Project operation noise would be a **less than a significant impact**.

b) *Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

Less than Significant Impact. Vibration is oscillatory movement of mass (typically a solid) over time. Depending on their distances to a sensitive receptor, operation of heavy construction equipment and vehicles on a construction site have the potential to cause high vibration amplitudes.

For purposes of this impact assessment, a vibration velocity level of 0.2 inches per second (ips) peak particle velocity (PPV) is used as the standard for evaluating human annoyance (to perceived ground-borne vibration within an occupied structure) and the potential risk for residential building damage due to “continuous” or frequently occurring ground-borne vibration events (Caltrans 2020).

Ground-borne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock can be estimated with expressions found in FTA and the California Department of Transportation guidance. By way of example, for a bore/drill rig operating as close as 75 feet to the nearest receiving residential land use during the paving construction phases (as shown in Tables 3.13-2 to 3.12-5), the estimated vibration velocity level would be 0.017 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} \times (25/D)^{1.5} = 0.017 \text{ ips } PPV = 0.089 \times (25/75)^{1.5}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receiver position (i.e., residence), PPV_{ref} is the reference value at 25 feet from the vibration source (the bore/drill rig), and D is the horizontal distance to the receiver from the source.

The predicted ground-borne vibration velocity PPV values associated with Project construction of 0.017 ips PPV are below the 0.2 ips PPV threshold for building occupant annoyance and building damage risk. Impacts during construction would be less than significant.

After completion of Project construction, operation of the submersible pumps within the wells and other Project components are unlikely to cause vibration at the nearest off-site structures. Powered mechanical systems like the submersible pump are designed with reciprocating and/or rotating components that are balanced well and machined to high tolerances of precision that consequently minimize vibration and help sustain long operational life. Furthermore, vibrational energy from pump operation at Well Heads #1 and #2 and the Treatment Building would be attenuated by both the pump enclosure and the surrounding soils. For this reason, Project operation ground-borne vibration at off-site receptors would be considered less than significant.

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

No Impact. There are no public airports or private airfields within 2 miles of the Project. The nearest airport is the San Bernadino International Airport, located approximately 9.5 miles south of the Project site. As such, the Project site is far from any aviation traffic noise contour greater than 65 dBA community noise equivalent level. Construction workers and park users would not be exposed to significant aviation noise levels. No impact would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project consists of the installation of two new groundwater wells and associated infrastructure. There are no new residential units or businesses proposed Project site. There are no proposed development of new roads or other infrastructure that would introduce new populations to the site, or service new populations. The Project would serve existing water users within the LACSD service district. Maintenance of the wells would be conducted by LACSD employees, on the order of one maintenance trip to the Project site per day, and thus would not require a high influx of new service employees. No impact would occur.

- b) ***Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

No Impact. The Project consists of the installation of two new groundwater wells and associated infrastructure. Project activities would not require existing people or housing to be relocated to accommodate the construction of the production wells. As such, the Project would not displace substantial

numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and no impact would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. PUBLIC SERVICES – Would the project:

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

Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Fire protection?

Less than Significant Impact with Mitigation Incorporated. The Project site is served by existing fire protection services provided by the San Bernardino County Fire Department. Fire Station 91 is the closest station to the Project site, approximately 0.27-mile to the northwest, located at 301 SR-173, Lake Arrowhead, CA 92352 (SBCFPD 2024). The proposed wells and associated infrastructure would not introduce habitable structures that could generate a long-term demand for fire protection services. Although there would be maintenance activities at the Project site (on the order of one roundtrip to the Project site per day), the increase would not be substantial. Also, the Project does not propose any new land uses that could generate a new resident population. Thus, the Project would not result in a need for new or physically altered fire protection facilities.

The proposed Project components would not be susceptible to fire, due to the nature of the Project as potable water wells. Project improvements would be constructed in accordance with applicable sections of the California Building Code and California Fire Code. Chapter 7A of the California Building Code, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new structures in a fire hazard severity zone. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Chapter 49 of the California Fire Code, Requirements for Wildland-Urban Interface Fire Areas, prescribes construction materials and methods in fire hazard severity

zones; requirements generally parallel California Building Code Chapter 7A. Compliance with applicable regulations would minimize the potential for fire and, therefore, the Project's demand for fire protection services.

Construction activities would temporarily create an increased demand for fire-protection services due to the use of equipment, electricity, fuels, and other fire sources that may ignite flammable and combustible materials. However, as previously mentioned in Section 3.9, Hazards and Hazardous Materials, the Project site is located within a VHFHSZ. MM-HAZ-1 would require measures to reduce the potential for on-site fire ignition. For example, no activities involving hot work would occur during high wind weather and workers on-site shall keep any combustible materials away from any fire or ignition sources. MM-HAZ-1 would also require that fire suppression systems, such as fire extinguishers and water pumps, which must be available on site. Implementation of MM-HAZ-1 would reduce the potential for fire hazards to occur and would therefore reduce demand for fire protection services, which would help maintain service ratios and responses times for existing fire protection services. Moreover, compliance with the applicable fire code provisions and coordination with the U.S. Forest Service and other fire agencies within the mountain community would minimize fire risk and thereby reduce impacts to fire protection services. In the event of an emergency during construction or operation of the Project, the Project would require the assistance for fire protection. However, unlike a residential, commercial, or industrial development, it is not expected that the Project would require frequent visits by these services. Impacts related to fire protection services would be less than significant with mitigation incorporated.

Police protection?

Less than Significant Impact. The Project site is served by existing police protection services provided by the San Bernardino County Sheriff's Department. The closest Sherriff's station is located at 26010 SR-189, Twin Peaks, CA 92391, approximately 2.45 miles southwest of the Project site. Implementation of the Project would not result in an increased land use intensity or introduce a new population on site which would require increased frequency in calls for service by police protection services. Operation of the Project would require one maintenance trip per day of the wells. In the event of an emergency, the Project would require the assistance for police protection. However, unlike a residential, commercial, or industrial development, it is not expected that the Project would require frequent visits for police protection. Impacts related to police protection services would be less than significant.

Schools?

No Impact. The Project would not generate a demand for school services because no residential land uses that may be occupied by households with school-aged children are proposed. Maintenance activities on the Project site would not create a demand for school services. No impact on schools would occur.

Parks?

No Impact. The Project would not generate a demand for parks or recreational facilities because the Project does not propose residential development that may be occupied by households that would utilize local parks and recreational areas. There would be no impact on the level of service at existing parks.

Other public facilities?

No Impact. The Project would not impact other public facilities such as libraries or hospitals. The proposed wells would be constructed within Project site and would not prevent the public from accessing any other public facilities. The Project would serve existing water users within the LACSD service boundary. Service ratios and response times would not be impacted with the development of the production wells. No impact related to libraries would occur.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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. The installation of two groundwater wells would not increase the use of existing neighborhood parks, campgrounds, trails, or other recreational facilities, and would not include the construction or expansion of new recreational facilities. The Project’s installation would not induce new populations that would result in the substantial physical deterioration of recreational facilities or require new facilities. No impact related to the use of existing neighborhood and regional parks or other recreational facilities would occur.

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?

No Impact. The Project does not include recreational facilities or require the construction or expansion of recreational facilities, which would have an adverse effect on the environment. There would be no impact related to the construction or expansion of recreational facilities .

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. The San Bernardino County Transportation Authority’s (SBTCA’s) Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment sets forth San Bernardino County’s methodology for determining the level of traffic analysis and review required for outline the specific steps for complying with the new CEQA expectations for VMT analysis and the applicable general plan consistency requirements. A Transportation Impact Analysis Report is not required to be prepared, except when a proposed change in land use, development project, or at local discretion, a group of projects are forecast to equal or exceed the Congestion Management Plan (CMP) threshold of 250 two-way peak hour trips generated (SBCTA 2020). Because the Project would not cause a change in land use that could generate a new population or long-term traffic impacts and is not a development project, no Transportation Impact Analysis is required. The Project would not permanently change any existing roadways, bicycle lanes, or pedestrian paths. The Project would generate minor increases in vehicle trips associated with short-term construction activities, due to the presence and use of construction equipment and vehicles for transport and hauling equipment. Construction activities would generate an average of six one-way vehicle trips from construction equipment and construction crews coming to the site, trucks bringing in building materials, and construction equipment leaving the site after each construction phase.

Construction workers, equipment delivery vehicles, and haul trucks are expected to access the Project site via SR-173 and would access and egress for construction-related traffic (workers and trucks) to the Project site would be at the existing driveway from SR-173 into the Project site. All required administrative, staging, storage, and laydown areas related to Project construction would be located within the Project site boundaries.

The Project would not impact a dedicated bicycle or pedestrian facility, as the Project site is located internal to an existing site that is surrounded by private property and would use an existing road as transit into the site. Additionally, there are no dedicated sidewalks or bicycle lanes in the vicinity of the Project site. There would be impact to the use of mass transit systems with the Project because the Project site is not directly served by a public transportation system and the Project would not create a new land use that could change existing demands for mass transit.

Furthermore, construction activities are required to be conducted in accordance with the Standard Specifications for Public Works Construction (Greenbook) to maintain access to the Project site. This includes notification of residents and businesses affected by the road work and utility agencies with facilities in the area. The Greenbook also requires that access be made available at the end of each workday. Additionally, temporary traffic control devices and methods used during construction would be required to conform to the requirements of the latest edition of the Manual on Uniform Traffic Control Devices (MUTCD) and the California Supplement to the MUTCD for traffic control during construction activities. The Contractor must provide traffic tapers, traffic control devices, barricading, and signs necessary to ensure driver awareness and safety in construction areas and to assist fire and law enforcement personnel.

During operations of the Project, there would be a minimal increase in vehicle trips necessary for maintenance activities of the proposed wells. Typical maintenance for the groundwater wells would utilize the existing road (which would be repaved) by use of one maintenance vehicle trip on a daily basis. The San Bernardino Associated Governments' Congestion Management Program (CMP) includes goals to maintain or enhance the performance of the multimodal transportation system, minimize travel delay, and reduce both vehicle trips and vehicle emissions (SANBAG 2016). The Project would not conflict with the goals of the CMP as it would not adversely impact the multimodal transportation system or cause travel delay due to the very low trip rate (i.e., six one-way trips to the Project site per day during construction and one two-way trip per day during Project operation) and would not result in substantial adverse air quality impacts due to vehicle emissions (refer to Section 3.3, Air Quality of this IS/MND for further discussion of air quality impacts). Therefore, the Project would not result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

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

No Impact. CEQA Guidelines Section 15064.3(b) focuses on the currently adopted vehicle miles traveled (VMT) metric for determining the significance of transportation impacts. The passage of SB 743 required the focus of transportation analysis to change from level of service or vehicle delay to VMT. Per the San Bernardino County Transportation Authority Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, projects generating less than 110 daily vehicle trips can be presumed to not result in a significant impact (SBCTA 2020). This is consistent with the Office of Planning and Research (OPR) technical advisory. As detailed in Table 3.3-2, Construction Scenario Details, of Section 3.3, Air Quality, of this IS/MND, it is anticipated that the Project would result in six one-way trips to the Project site per day for worker, vendor, and haul trucks per day during Project Construction. Furthermore, Project operation would result in one round-trip (i.e. two one-way trips) per day for maintenance to and from the Project site. Therefore, the Project would generate less than 110 daily vehicle trips and can be presumed to not result in a significant impact. As such, there would be no impact regarding the Project's potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

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 Project would not change any design features of the existing roadways and would not involve any incompatible uses. The existing degraded asphalt road on-site would be repaved with implementation of the Project, but the alignment of this road would not change. The Project would result in a waterline connection within SR-173; however, these activities would not change the alignment of SR-173. Additionally, during construction, adherence to the Greenbook would be required. The Greenbook also requires that access be made available at the end of each workday. Adherence to this regulation would ensure that there would not be increased hazards for any users of the road. Implementation of the Project during construction and operation would not result in increased roadway hazards. There would be a less than significant impact regarding the potential for the Project to substantially increase hazards due to a geometric design feature or incompatible uses.

d) *Would the project result in inadequate emergency access?*

Less than Significant Impact with Mitigation Incorporated. As discussed in Section 3.9(f), SR-173 is a designated evacuation route, and temporary construction activities would be required in the SR-173 roadway right-of-way to connect a water pipeline extension from the Project site to an existing utility line, which would require partial lane closure. All other Project activities would occur on site. In order to reduce potential impacts related to roadway traffic and emergency access, MM-TRA-1 is required. MM-TRA-1 would require preparation of a construction traffic control plan, including coordination with emergency response providers, use of appropriate signage and/or flaggers, and prior notification of property owners/residents. With implementation of MM-TRA-1, the Project would not result in inadequate emergency access. Impacts related to emergency access would be less than significant with mitigation.

MM-TRA-1 Construction Traffic Management Plan. Prior to construction of the Project, the Lake Arrowhead Community Services District (LACSD) shall prepare a detailed Construction Traffic Management Plan in accordance with the San Bernardino County's Road Construction Permit requirements and the California Department of Transportation (Caltrans) District 8 Traffic Operations requirements. The plan shall be submitted to the County of San Bernadino Public Works Department and Caltrans for approval, and all necessary encroachment approvals shall be obtained, prior to commencing construction activities in the roadway right-of-way. The plan shall contain the following elements, subject to the discretion of Caltrans:

- Anticipated days and time of construction
- Signage and traffic control plan (e.g., flaggers)
- Prior notification of property owners/residents whose access will be affected
- Detour routes, if necessary
- Alternate pedestrian/bicycle access, if necessary
- Coordination with local emergency response providers (i.e., police, fire, and medical dispatch)
- Installation of temporary construction signs to warn vehicular traffic of reduced speed limits in construction zone
- Establish requirements for loading/unloading and storage of materials on the Project site, where length of time traffic travel lanes could be encumbered and/or

sidewalk closings or pedestrian diversions would be implemented, to ensure the safety of the pedestrians

- Limit potential roadway lane closure(s) to off-peak travel periods.
- Identify a contact person in the Construction Traffic Management Plan that would be available to oversee implementation of the Plan and address any community concerns.

3.18 Tribal Cultural Resources

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

The evaluation of potential impacts on tribal cultural resources (TCRs) is based on the findings resulting from tribal consultation conducted by the LACSD, as the lead agency, as well as the findings of Section 3.5, Cultural Resources, in this MND. Background research conducted to inform this analysis includes a California Historical Resources Information System database records search conducted at the SCCIC, a search of the NAHC SLF, archival research, a cultural resources pedestrian survey of the Project site, and the results of formal tribal consultation to date by LACSD pursuant to AB 52.

NAHC SLF Search and Tribal Correspondence

A NAHC search of the SLF was requested for the Project site and 1-mile radius on February 15, 2024. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on February 20, 2024, stating that the SLF search was completed with positive results. Positive results indicate the presence of Native American cultural resources within 1 mile of the Project site, and not necessarily directly within the Project site. The NAHC additionally provided a list of nine Native

American individuals and/or tribal organizations that should be contacted for more information on potential tribal sensitivities regarding the Project.

Tribal outreach letters were mailed on March 1, 2024, to all California Native American tribal representatives included on the NAHC contact list. These letters attempted to solicit additional information relating to Native American cultural resources that may be impacted by the Project. Native American tribal representatives were requested to define a general area where known resources intersect the Project site. To date, two responses have been received from this information request. These responses are paraphrased below:

Xitlaly Madrigal of the Agua Caliente Band of Cahuilla Indians (Agua Caliente) responded on March 3, 2024. Ms. Madrigal's response indicated that, after a records check of the Tribal Historic Preservation Office's cultural registry, the Project site is not located within the boundaries Agua Caliente consider their Traditional Use Area. Ms. Madrigal also stated that Agua Caliente defer consultation efforts to other tribes in this area and that her letter serves as Agua Caliente's conclusion of consultation on the Project.

Eunice Ambriz of the Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians) responded on March 11, 2024. Mr. Ambriz's response indicated that the Project site is considered moderately culturally sensitive by the Yuhaaviatam of San Manuel Nation (Yuhaaviatam), and that Yuhaaviatam wish to engage with LACSD in government-to-government consultation pursuant to Assembly Bill (AB) 52.

Assembly Bill 52

AB 52 of 2014 amended California Public Resources Code Section 5097.94 and added California Public Resources Code Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. California Public Resources Code Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe. A TCR may be defined as a resource that is:

- On the CRHR or a local historic register
- Eligible for the CRHR or a local historic register
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in California Public Resources Code Section 5024.1(c)

AB 52 formalizes the lead agency-tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project area, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report by contacting those tribal groups who have previously provided formal written request for notification of projects under the agency's jurisdiction.

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the California Public Resources Code, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to

TCRs, the consultation shall include those topics (California Public Resources Code Section 21080.3.2[a]). Finally, the environmental document on which the tribal consultation is focused, as well as the mitigation monitoring and reporting program (where applicable), developed in consideration of information provided by tribes during the formal consultation process, shall include any mitigation measures that are adopted (California Public Resources Code Section 21082.3[a]).

Assembly Bill 52 Consultation

The Project is subject to compliance with AB 52 (California Public Resources Code Section 21074), which requires consideration of impacts to TCRs as part of the CEQA process and that the lead agency notify California Native American tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the Project. As lead agency, LACSD sent notification letters pursuant to AB 52 via United States Postal Service Certified Mailing on October 31, 2024, to six (6) tribal representatives listed on LACSD’s Native American Contact List. Following notice that certain correspondence was undeliverable, LACSD reissued AB 52 notification letters on February 20, 2026, to the two (2) tribal representatives for whom delivery was unsuccessful. The notification letters contained a project description, a Project location map, outline of AB 52 timing, an invitation to consult, and contact information for the appropriate lead agency representative. Table 3.18-1 summarizes the results of the AB 52 consultation efforts for the Project thus far. At the time of preparation of this IS/MND, tribal consultation pursuant to AB 52 is ongoing. LACSD will continue to engage in good faith consultation with any tribe that has requested consultation, consistent with Public Resources Code § 21080.3.1, and will incorporate the results of consultation into the final environmental document, as appropriate.

Table 3.18-1. Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Consultation Record
Denise Torres, Cultural Resources Manager Morongo Band of Mission Indians	No response has been received to date.
Robert Martin, Chairperson Morongo Band of Mission Indians	No response has been received to date.
Donna Yocum, Chairperson San Fernando Band of Mission Indians	No response has been received to date.
Lee Clauss, Director of Cultural Resources Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians)	November 26, 2024 Email from Kristen Tuosto on behalf of the Yuhaaviatam of San Manuel Nation to LACSD providing recommended mitigation measures for the Project.
Wayne Walker, Co-Chairperson* Serrano Nation of Mission Indians	No response has been received to date.
Mark Conchrane, Co-Chairperson* Serrano Nation of Mission Indians	No response has been received to date.

*AB 52 notification letters reissued on February 20, 2026

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

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

Less than Significant. As discussed in Section 3.5, no previously recorded cultural resources of Native American origin or TCRs listed in the CRHR or a local register were identified within the Project site as a result of the SCCIC records search. Although the NAHC SLF search results are positive, it is important to note that the SLF file is maintained at a public land survey system section level, meaning that positive results are respective of a general area covering approximately 1 square mile (640 acres), rather than the exact area of study; therefore, a positive result does not necessarily equate to the existence of resources within the specific area occupied by the Project site. Additionally, the pedestrian survey did not identify any cultural resources of Native American origin within the Project site; however, the majority of the ground surface was obscured by hardscape, dense vegetation, and leaf litter.

As a result of LACSD's AB 52 notification efforts and Dudek's Tribal correspondence to date, one (1) tribal entity requested consultation on the Project: The Yuhaaviatam of San Manuel Nation ([YSMN], formerly San Manuel Band of Mission Indians).

The YSMN responded to Project notification via an email from Kristen Tuosto on behalf of YSMN to LACSD providing recommended measures for the Project. According to YSMN, the proposed project area exists within Serrano ancestral territory and is near a sensitive location for YSMN, but that it is unlikely that the development of this Project would impact the sensitive location. Therefore, YSMN does not have any concerns with the Project's implementation, as planned, at this time. This is further addressed in Threshold b, below.

Through consultation efforts conducted by LACSD to date, no additional information has been provided to support the presence of specific, geographically defined TCRs that could be affected by Project-related construction or operation. No known cultural resources of Native American origin or association have been identified within areas that would be affected by the Project. While LACSD acknowledges that the landscape surrounding the Project was traditionally used by indigenous peoples, no substantial evidence was presented demonstrating that the Project has the potential for affecting known TCRs, as defined by PRC Section 21074(a). Impacts would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. Under AB 52, TCRs are defined as resources that the lead agency determines to be a TCR with a substantial burden of evidence. To date, no known TCRs have been identified through consultation that would be impacted by the Project. However, the unanticipated discovery of unknown TCRs during project construction is a possibility.

In acknowledgment of information provided through consultation and in an effort to protect unknown TCRs, LACSD has developed the following mitigation measures to address potential impacts related to the inadvertent discovery of TCRs during construction. During consultation efforts to date, mitigation measures to reduce impacts to TCRs were provided by YSMN. These mitigation measures were incorporated into MM-TCR-1, which sets forth a treatment protocol for the unanticipated discovery of TCRs. Additionally, MM-CUL-1, Unanticipated Discovery of Archaeological Resources, and MM-CUL-2, Unanticipated Discovery of Human Remains, would also reduce potential impacts to TCRs in the case that unanticipated discovery of archaeological resources or human remains are encountered.

The implementation of MM-TCR-1, MM-CUL-1, and MM-CUL-2 would ensure the proper treatment of unknown TCRs in the event of an unanticipated discovery and would reduce impacts from the proposed Project to less than significant with mitigation incorporated.

Mitigation Measures

MM-CUL-1 and MM-CUL-2, included in Section 3.5, Cultural Resources, of this Draft IS/MND.

MM-TCR-1 Unanticipated Discovery Protocol for Tribal Cultural Resources. Prior to commencement of construction activities, interested consulting Tribe(s) (Tribes) shall be invited to provide information to the construction crew about the kinds of tribal cultural materials that may be identified during earthwork, the importance of and legal basis for the protection of significant resources, and the actions to be taken in the event of the discovery of tribal cultural resources or human remains during ground-disturbing activities. In the event that any pre-contact cultural resources are discovered during Project implementation, the Tribes shall be contacted, and provided information regarding the nature of the find in order to provide input regarding significance and treatment. Should the find be deemed significant, as defined by the California Environmental Quality Act, a Cultural Resources Monitoring and Treatment Plan (CRMTP) shall be created by a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards and in coordination with the LACSD and the Tribes. All subsequent finds shall be subject to compliance with the CRMTP. The CRMTP shall include provisions for the lead agency to invite a Native American monitor representing the Tribes to be present for the remainder of the Project, should the Tribes elect to place a monitor on-site. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant/lead agency for dissemination to the Tribes. The lead agency shall, in good faith, consult with the Tribes throughout the remainder of the Project.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the waste water 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. The potential impacts associated with Project utilities, which include two new groundwater wells, extension of a water pipeline, and abandonment of an existing sewer line, are evaluated throughout this IS/MND. During construction activities, no restroom or other wastewater generating facilities are proposed as part of any of the Project components. During construction, portable toilets may be provided at the site for the construction crew, and these portable toilets would be regularly cleaned and their contents disposed of off-site by an outside company. Wastewater from these portable toilets would not exceed Lahontan RWQCB treatment requirements. Also, an insignificant amount of wastewater would be generated by these portable toilets, and the Project would not result in the need for new or expanded treatment facilities. Capacity at existing wastewater treatment plants would not be exceeded during construction of the proposed Project.

During construction, the Project would also be required to discharge partially treated groundwater as a result of well drilling activities. To achieve this, the Project would construct an on-site lateral to tie into an existing mainline sewer within SR-173 at the northern boundary of the Project site, but would not require the construction of any off-site wastewater conveyance infrastructure. The process would require the discharge of approximately 20,000 gallons per day of wastewater to the sewer system. As discussed in Section 3.19(e) of this IS/MND, disposal of treated groundwater is considered a “low threat discharge” that is conditionally exempt from the Basin Plan’s discharge prohibitions (LRWQCB 2023). The wastewater would be discharged to the existing sanitary sewer collection system, which is operated and maintained by LACSD. Wastewater would be conveyed by interceptor lines and ultimately treated at the Grass Valley Wastewater Treatment Plant (WWTP) (LACSD 2021). The Grass Valley WWTP is permitted for 3.75 million gallons per day and processes an average of 1.2 million gallons per day of wastewater, for a total remaining capacity of 2.55 million gallons per day (LACSD 2021). The increase in wastewater as a result of the Project would represent approximately 1% of the daily remaining capacity of the Grass Valley WWTP, which is not significant. Therefore, capacity at existing wastewater treatment plants would not be exceeded during construction of the proposed Project. As such, the Project would not result or require construction of new or expanded water treatment facilities beyond the scope of the Project.

As detailed in Section 2.4, Project Characteristics, prior to performing any subsurface activities, the Project well locations would be scanned for underground utilities using geophysical methods. The utility-locating contractor would employ several methods, including ground-penetrating radar, magnetometer, magnetic gradiometer, and/or electromagnetic imaging. As required by State law, DigAlert would be notified of the planned drilling activities. DigAlert is a communication center that provides notice to utility owners that may potentially have underground utilities within the proposed well sites. DigAlert requires notification a minimum of 48 hours prior to conducting any underground excavation. Following map review, geophysical utility locating, and DigAlert clearance, the surface of the ground would be clearly marked where underground utilities are discovered. The drilling location would be selected to avoid impact to existing utilities.

The Project would not generate substantial increased stormwater runoff, such that new stormwater drainage facilities or facility expansion would be required. As described in Section 3.10, Hydrology and Water Quality, of this IS/MND, the Project would slightly increase impervious areas on the Project site. However, this minor increase in impervious area would not have a substantial effect on the amount of stormwater runoff that would come from the Project site. Operation of the Project is anticipated to consume approximately 187,104 kWh/yr. Therefore, although the Project would result in an increase in overall electrical usage compared to existing conditions, no new major infrastructure (i.e., new energy sources) would be required. The Project is not anticipated to require or involve the relocation or construction of new utilities for wastewater, electrical power, natural gas, stormwater, and telecommunications. The proposed potable groundwater wells would connect to existing LACSD pipelines to supplement LACSD’s water supply. The Project would serve existing users within the LACSD service area. The Project would not include additional construction of residential, commercial, or industrial facilities that would require new or expanded utilities. No demand for natural gas or telecommunication services would be required with implementation of the Project. Impacts would be less than significant.

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. The Project itself is the construction of new water infrastructure to bolster reliability of water in the LACSD service area. The Project would not require new construction or significant expansion of facilities that would require additional water supplies. The Project would supplement water supply obligations to the Lake Arrowhead community with the implementation of the proposed groundwater wells. The installation and operation of these wells would allow LACSD to provide enough water supplies to its existing users. Impacts would be less than significant.

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

Less than Significant Impact. As discussed in Section 3.19(a), wastewater from the Project would be discharged via a new on-site lateral to the existing sewer line at the northern Project site boundary that continues under SR-173. This volume of wastewater would be minor in the context of the wastewater treatment capacities of Grass Velly WWTP, which has a total remaining treatment capacity of 2.55 million gallons per day (LACSD 2021). During construction, the Project would discharge approximately 20,000 gallons per day into the sanitary sewer system. This volume would represent approximately 1% of the daily wastewater capacity of the Grass Valley WWTP. As such, the amount of wastewater produced by the Project would be minor relative to the amount of water that is processed at LACSD facility, and the amounts of wastewater related to Project activities would not require new wastewater treatment facilities. Therefore, impacts related to wastewater treatment facilities would be less than significant.

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. Waste generated during construction of the Project would include excess well construction materials, vegetation, and other related debris. Given that there are no structures on site that would need to be demolished and transported, it is not anticipated that the Project would generate substantial amounts of solid waste that would affect the capacities of serving landfills and recycling centers. Solid waste generated during construction would be diverted to regional landfills or recycling facilities using County-approved franchise haulers. The closest solid waste disposal sites to the Project site are the Heaps Peak Transfer Station in Lake Arrowhead and the Mid-Valley Landfill in the City of Rialto, which are approximately 2.55 miles and 15 miles from the Project site, respectively. Drilling fluids would be disposed at sites that accept hazardous wastes. Other wastes, including vegetation, would be disposed of in accordance with County and LACSD approved methods and locations. Once the Project is completed, the operation and maintenance of the wells are not expected to generate significant quantities of solid wastes unless the well and other accessories would require a full replacement. These wastes would be diverted, discarded, or recycled as directed by the manufacturer, and by County and LACSD approved methods and locations. Impacts would 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. Construction activities would generate construction waste, such as equipment packaging, construction scrap, and debris. Any non-recyclable and hazardous construction waste generated would be disposed of at a landfill approved to accept such materials. All collection, transportation, and disposal of solid waste generated by the Project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. Furthermore, SB 1016 requires 50% diversion requirement to be calculated in a per capita disposal rate equivalent. As a result, compliance with applicable laws for recycling and disposal of solid waste would result in less-than-significant impacts as it relates to the Project. Therefore, impacts associated with solid waste disposal regulations would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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 with Mitigation Incorporated. As previously stated, the Project site is located within a State Responsibility Area classified as a VHFHSZ (CAL FIRE 2024). The applicable emergency response plan is the San Bernadino County Emergency Operations Plan (EOP), which includes guidance for emergency evacuation.

The Project would utilize the SR-173 for transport of equipment and materials during construction activities, although the Project would result in an average of six one-way trips to the Project site each day for worker, vendor, and haul truck trips. This number of trips is minimal, and would likely occur during the beginning and end of each workday, and would not substantially impair an adopted emergency response plan or emergency evacuation plan.

However, temporary construction activities would be required in the SR-173 roadway right-of-way to connect a water pipeline extension from the Project site to an existing utility line, which would require partial lane closure during said activities. As SR-173 is a designated emergency access route, partial lane closure as a result of Project construction would occur for approximately one month and could result in a potentially significant impact regarding the potential to substantially impair the adopted EOP. As such, implementation of MM-TRA-1, Construction Traffic Management Plan, would be required. MM-TRA-1 would require preparation of a construction traffic management plan, including coordination with emergency response providers, use of appropriate signage and/or flaggers, and prior notification of property owners/residents, among other requirements. MM-TRA-1 would require detailing of other detour routes, if applicable, and the limitation of potential roadway land closure(s) to off-peak travel periods. With implementation of MM-TRA-1, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

During operational activities, typical maintenance of the Project would utilize the existing roadways, including an existing degraded asphalt roadway which would be repaved on-site. There is anticipated to be one round trip per day to the Project site for maintenance purposes, and the Project would not result in any road closures that would substantially impair an adopted emergency response plan or emergency evacuation plan during operations.

As such, the Project would result in less than significant impacts with mitigation regarding the potential to substantially impair an adopted emergency response plan or emergency evacuation plan.

- b) ***If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, would the project 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 with Mitigation Incorporated. As previously stated, the Project site is located within a VHFHSZ State Responsibility Area (CAL FIRE 2024), and therefore, an analysis of this threshold is warranted.

The Project proposes the construction of two groundwater wells and associated waterline, holding tank, and water treatment facility building, which would not involve development of infrastructure that would introduce new populations to significant wildfire risks. The Project site generally descends from SR-173 to the south with various slope ratios (Appendix D-1). However, As discussed in Section 3.7, Geology and Soils, of this IS/MND, the Project site is located within a designated low to moderate potential landslide area (i.e., the lowest risk area) (County of San Bernadino 2022; Appendix D-1). Additionally, the Project site is not located within a zone of required investigation for earthquake-induced landslides (DOC 2024). There are no known landslides near the site, nor is the site in the path of any known or potential landslides. The Project would not include extensive cut grading that would exacerbate existing slope ratios or result in additional fire risks related to slope.

The vegetation/land cover within the Project site consists of cedar forest and woodland alliance. This community dominates the overhanging tree canopy; however, the understory contains areas of significant disturbance such as within the limits of the degraded asphalt road on the Project site and a cleared area in the northwest corner of the study area. Given the conditions after the construction of the Project would be essentially the same as existing conditions, the Project is not anticipated to exacerbate fire risks related to vegetation.

The Project site's average wind speed ranges from 6 to 8 miles per hour (mph) throughout the year and from February to November comes from the west, with predominant wind direction in the other months coming from the north (Weather Spark 2024). However, the Project would not result in alterations to terrain or structures that would influence slopes or prevailing winds. Additionally, Project improvements would be constructed in accordance with applicable sections of the California Building Code and California Fire Code, which would reduce wildfire risk. However, as discussed in Section 3.9(g), during construction activities, wildfire risk would be increased, as the Project site is within an VHFHSZ and the Project site itself is heavily wooded. As such, MM-HAZ-1 is required to ensure safeguards would be implemented to prevent accidental ignition of nearby vegetation. Compliance with MM-HAZ-1 would provide adequate safety measures to reduce wildfire risk. For these reasons, wildfire impacts related to slope, prevailing winds, and other factors (i.e., vegetation) would be less than significant with mitigation incorporated.

- c) ***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 with Mitigation Incorporated. As previously stated, the Project site is located within a VHFHSZ State Responsibility Area (CAL FIRE 2024), and therefore, an analysis of this threshold is warranted. In addition to construction of two groundwater wells, the Project would include a water pipeline connection from the Project site to an existing utility line in SR-173 that may result in a potentially significant impact regarding the exacerbation of temporary fire risk during construction activities, as construction activities would result in temporarily increased wildfire risk due to the use of equipment, electricity, fuels, and other fire sources that may ignite flammable and combustible materials. No additional installation or expansion of associated infrastructure (such as fuel breaks, emergency water sources, or other utilities) would occur that could exacerbate fire risk. As such, MM-HAZ-1 is required to ensure safeguards would be implemented to prevent accidental ignition of nearby vegetation during construction activities. Compliance with MM-HAZ-1 would provide adequate safety measures to reduce wildfire risk during construction activities. No additional installation or expansion of associated infrastructure (such as

roads, fuel breaks, emergency water sources, power lines, or other utilities) would occur that could exacerbate fire risk.

After implementation of construction activities, the associated infrastructure (i.e., the waterline connection within SR-173) would be consistent with current conditions, as SR-173 and the existing degraded asphalt road on-site would be repaved. In addition, the Project would comply with applicable California Building Code and California Fire Code provisions to provide adequate safety measures to protect residents within the Project site’s vicinity. For these reasons, wildfire impacts related to installation or maintenance of associated infrastructure would be less than significant with mitigation incorporated.

- d) ***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 with Mitigation Incorporated. As previously stated, the Project site is located within a VHFHSZ State Responsibility Area (CAL FIRE 2024), and therefore, an analysis of this threshold is warranted. The Project would not involve development of infrastructure that would introduce new populations to significant wildfire risks. As demonstrated in Section 3.7, Geology and Soils of this IS/MND, the Project site is in an area with low to moderate susceptibility to landslides, would not increase the risk of landslide risk, and is not within a flood zone area. The Project would be required to comply with the County’s LID standards, which would minimize runoff. The Project would include highly localized drainage improvements that would allow the site to better handle existing flows that occur after such storm events under existing conditions. As such, these drainage changes would likely reduce risks associated with flooding. Additionally, as discussed under Section 3.20(b), with implementation of MM-HAZ-1, the Project would not result in a significant increase in fire risk and as such would not contribute to a significant risk related to slope instability. Therefore, the Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant with mitigation incorporated.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?***

Less than Significant Impact with Mitigation Incorporated. As described in Section 3.4, Biological Resources of this IS/MND, special-status plants have a moderate to high potential to occur in the undeveloped habitat on Project site. As such, MM-BIO-1, Pre-Construction Rare Plant Surveys, is necessary to require a qualified biologist to conduct plant surveys for the 12 special status plant species that have a moderate to high potential to occur on the Project site. In addition, while no special-status wildlife were incidentally observed during the biological reconnaissance, there is suitable habitat for various avian and mammalian special-status wildlife species on the Project site. As such, implementation of MM-BIO-2 requires that pre-construction surveys be conducted for special-status wildlife, and MM-BIO-3 requires that Crotch’s bumble bee nesting surveys be conducted if ground-disturbing activities take place during the Queen Flight Season (February 1 through August 31). If special-status wildlife is observed inhabiting the Project’s construction footprint area, additional avoidance or mitigation measures would be required, including but not limited to establishing buffer areas, moving the species out of the Project area, and biological monitoring for special-status wildlife during construction activities. Furthermore, although no nesting birds were observed during the biological reconnaissance, old-growth coniferous and deciduous trees within the densely vegetated habitat on the Project site have the potential to support foraging and nesting opportunities for raptors and migratory birds protected under the MBTA and CFG Code Section 3500. To avoid impacts, MM-BIO-4, Nesting Bird Avoidance, will be implemented and require a pre-construction nesting survey should be conducted within 3 days prior to ground-disturbing activities to determine the presence/absence of nesting birds. If an active nest is found on the study area, a qualified biologist shall establish a buffer around the nest (up to 500 feet for raptors and California spotted owl and 300 feet for songbirds) and ongoing biological monitoring during construction may be required until the nestlings have fledged, and the nest is no longer active. In addition, although no riparian scrub or woodland habitat was observed on the Project site, the non-wetland water within the unnamed drainage in the ravine

to the immediate east of the Project site is fed by natural mountain seeps that are all considered a natural watercourse, and potentially jurisdictional aquatic features. As such, the habitat within the drainage may be considered a sensitive riparian habitat. MM-BIO-5, Aquatic Resources Regulatory Permitting, requires permitting and restoration for Project-related temporary impacts to jurisdictional aquatic resources. Finally, trenching with heavy machinery may result in impacts to tree roots that encroach into the proposed trench alignment. As such, MM-BIO-6, Tree Protection Measures will be implemented, which requires tree protection measures during construction activities to ensure impacts to tree roots would be less than significant. With implementation of these required mitigation measures, the Project would not have the potential to 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Impacts would be less than significant with mitigation incorporated.

While there are no known important examples of California prehistory on the Project Sites, there is the potential for previously unknown archaeological resources to be encountered on the site during ground-disturbing activities associated with construction of the proposed Project. As such, MM-CUL-1, Unanticipated Discovery of Archaeological Resources, will be implemented, which sets forth requirements for the treatment of inadvertently discovered archaeological resources until a qualified archaeologist can assess and evaluate the discovery pursuant to CEQA. With implementation of MM-CUL-1, potentially significant impacts to unknown archaeological resources would be reduced to less than significant with mitigation incorporated. Furthermore, while no prehistoric or historic-era burials, including those interred outside of formal cemeteries, were identified within the Project site, there is a possibility of encountering human remains within the Project site during construction activities. As such, MM-CUL-2, Unanticipated Discovery of Human Remains will be implemented, which requires compliance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code. If human remains are found, the County Coroner shall be immediately notified of the discovery and no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC within 24 hours. Adherence to MM-CUL-2 would ensure that impacts to human remains resulting from the Project would be less than significant with mitigation incorporated. In addition, no tribal cultural resources were identified on the Project site during consultation with Tribes in accordance with AB 52. However, YSMN requested that mitigation measures be required of the Project in the event that previously unidentified tribal cultural resources were present on-site. Therefore, implementation of MM-TCR-1 would be required to ensure that impacts to potential TCRs would be less than significant. At the time of preparation of this Draft IS/MND, tribal consultation pursuant to AB 52 is ongoing. LACSD will continue to engage in good faith consultation with any tribe that has requested consultation, consistent with Public Resources Code §21080.3.1, and will incorporate the results of consultation into the final environmental document, as appropriate. For these reasons, impacts to cultural resources and tribal cultural resources resulting from the Project would be less than significant with mitigation incorporated. No further mitigation is required.

As such, with the implementation of MM-BIO-1 through MM-BIO-6, MM-CUL-1, MM-CUL-2, and MM-TCR-1, the Project would not 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. Impacts would be less than significant with mitigation incorporated. No further mitigation is required.

- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***

Less than Significant Impact with Mitigation Incorporated. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which states that an EIR must be prepared if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Alternatively, a lead agency may determine a project’s incremental contribution to a cumulative effect is not cumulatively considerable through mitigation measures set forth in an MND or if the project will comply with the requirements in a previously approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.

The proposed Project would potentially result in Project-related impacts to biological resources, cultural resources, hazards and hazardous materials, public services (fire protection), transportation, tribal cultural resources, and wildfire that could be potentially significant without the incorporation of mitigation. Thus, when coupled with potential impacts related to the implementation of other related projects throughout the broader Project vicinity, the Project would potentially result in cumulative-level impacts if these significant impacts were left unmitigated.

However, the potentially significant impacts of the Project are primarily related to construction, which would be of short duration and would not be likely to overlap with a related project’s construction period to result in a cumulatively considerable impact. Furthermore, the operational characteristics of the Project are minimal and would not result in habitable development (i.e., adding homes or business) or an increased service population. Long-term, operational impacts are primarily on site and related to the groundwater within the catchment area. As discussed in Section 2.2, Environmental Setting, the watershed itself is relatively small, contained by granite rock, and only affected by one existing well (i.e., Moller’s well). The potential “cumulative” impacts to the catchment of the Project wells together with Moller’s well are adequately analyzed in Section 3.10. Hydrology and Water Quality of this MND and would be less than significant with mitigation incorporated. In summary, with the incorporation of mitigation identified throughout this MND, the Project’s impacts to biological resources, cultural resources, hazards and hazardous materials, public services (fire protection), transportation, tribal cultural resources, and wildfire would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. In addition, any other nearby projects would presumably be bound by their applicable lead agency to (1) comply with all applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels.

Although cumulative impacts are always possible, the proposed Project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. Therefore, the Project would result in individually limited, but not cumulatively considerable, impacts that are less than significant with mitigation incorporated.

c) *Does 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. Numerous factors discussed above in this IS/MND pertain to the quality of the human environment. Potentially significant impacts related to fire hazards during construction as well as construction traffic have the potential (without mitigation) to cause adverse effects on human beings related to public safety. However, regarding public safety, as discussed in Section 3.9, Hazards and Hazardous Materials, MM-HAZ-1 is required to address potential impacts related to fire hazards during construction, while MM-TRA-1, discussed in Section 3.17, Transportation, is required to address potential impacts related to construction traffic hazards. As evaluated throughout this IS/MND, with incorporation of the mitigation measures identified herein, all environmental impacts associated with the Project would be less than significant. Thus, the Project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

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Mandatory Findings of Significance

N/A

4.2 List of Preparers

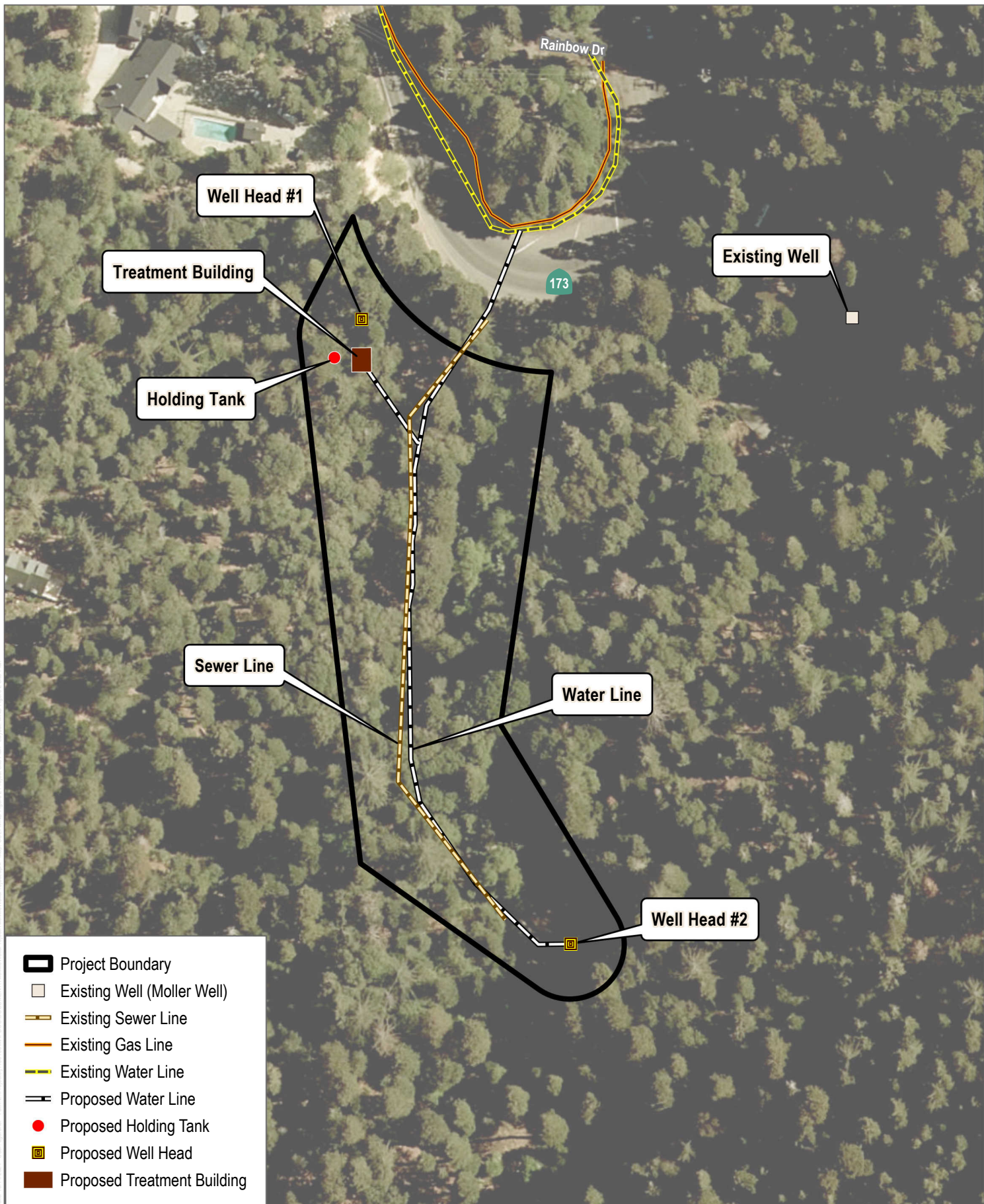
Lake Arrowhead Community Services District

Catherine Cerri – General Manager
Scott Schroder – Engineering Manager
Gustavo Albarran – Engineering Technician
Mica O'Connell – Water Operations Supervisor
Matt Brooks – Operations Manager

Dudek

Kristin Starbird – Principal-in-Charge
Daria Sarraf – Project Manager
Samantha Robinson – Environmental Planner
Tommy Molioo – Senior Biologist
Kimberly Narel – Biologist
Roshanne Bakhtiary – Archaeologist
Katie Ahmanson, MHC – Architectural Historian
Jim Cowan, INCE, Bd.Cert. – Lead Acoustician
Nick Segovia – Environmental Acoustician
Carson Wong – Environmental Acoustician
Sarah Siren – Paleontologist
Shawna Johnson – Paleontologist

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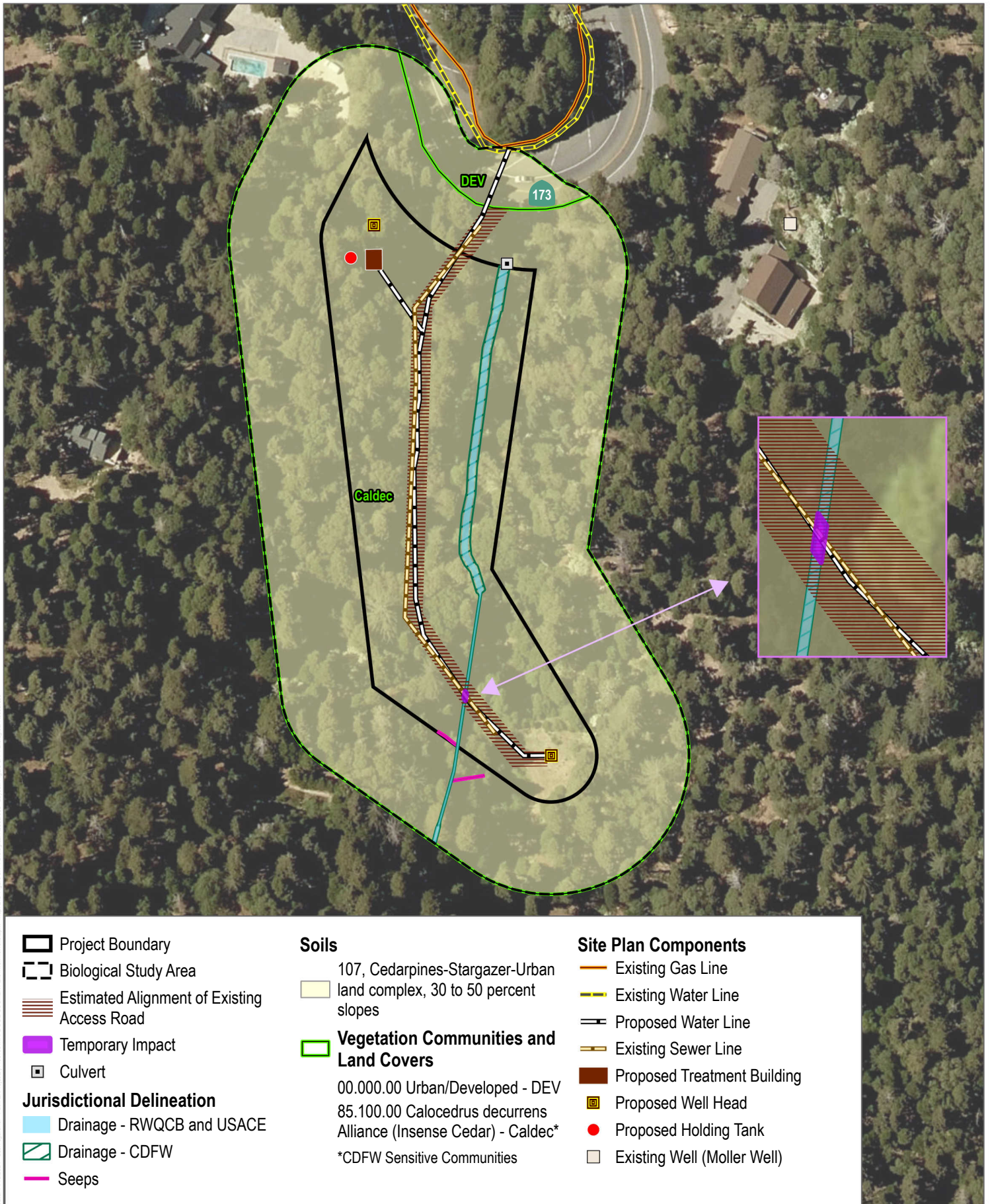
SOURCE: Esri World Imagery; LASCDC 2024



FIGURE 2
Project Site Plan

Two-Mile Groundwater Wells Project

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SOURCE: Esri World Imagery; USDA 2024

DUDEK



0 65 130 Feet

FIGURE 3

Biological Resources

Two-Mile Groundwater Wells Project

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