REVISED CEQA INITIAL STUDY FOR PROPOSED PIXIOR WAREHOUSE 55555 AMARGOSA ROAD

APN 0405-062-51- 0-000

HESPERIA, SAN BERNADINO COUNTY, CALIFORNIA
(Township 4 North, Range 5 West, Section 14, MDB&M)

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1.0 INTRODUCTION

This document constitutes an Initial Study for the Pixior Warehouse Project designed to meet the requirements of the California Environmental Quality Act (CEQA) for the City of Hesperia, California. The City of Hesperia is the lead agency for CEQA compliance for the Proposed Project (see below for Project Description).

1.1 PROJECT LOCATION

The Proposed Project is the construction of a warehouse building (444,000 square feet) on a 20.84 acre parcel of land in the City of Hesperia, California (see Figures 1-4). The Assessor Parcel Number (APN) is #0405-062-51 in San Bernardino County California. The Site lies in Section 14, Township 4 North, Range 5 West, San Bernardino Base and Meridian (SBB&M).

The Site is currently undeveloped land. The Site is bare land, with typical high desert scrub with native shrub vegetation and a number of Joshua Trees. The Site has nearly level topography with a few small hillocks, generally 2-6 feet in height. There are a few debris piles present as well as a dirt driveway and other dirt tracks where unauthorized dirt bikes have used the Site.

The Project Site (Site) lies in a commercial area of the City of Hesperia, roughly 0.3 miles north of Main Street (Figures 1-4). The Site is bounded by the California Aqueduct on the south side. To the north is a large toy manufacturer's warehouse with associated parking along Live Oak Lane to the north. Amargosa Road lies immediately east of the Site with the Interstate 15 Freeway beyond Amargosa Road to the east. Undeveloped parcels lie to the north and west of the Site.

1.2 PROPOSED PROJECT DESCRIPTION

The Project is expected to consist of development of a single large warehouse building and associated parking. The Site is currently high desert open space. The property owner is proposing to establish a warehouse (Pixior Warehouse) on the property.

The proposed Site Plan is shown in Figure 5. The warehouse building will be 444,000 square feet in size. There will be dock-high parking spaces for unloading areas for large trucks (approximately 81), three ground level truck doors and parking areas, and 258 spaces for employee and visitor vehicles. The building will be an L-shape with large truck docking on the north and west sides of the L, with employee and visitor vehicle parking on the northeast and east sides of the building. There will be a 16,500 square foot office within the building (included in the 444,000 square feet). The building will be powered primarily by solar energy from solar roof panels. Building height will be approximately 40 feet.

Fire lanes will be established around the perimeter of the building as required by City Code. Stormwater detention facilities will be provided in the northwest corner of the parcel. The parking areas will be paved with asphalt, with concrete truck dock aprons.

A concrete sidewalk will be installed along Amargosa Road. Small strips of irrigated landscaping will be installed on the east side of the project. Small strips of natural landscape will be retained on the south, west and north sides of the Project. The Project will be fully fenced and will include a security gate and guardhouse.

1.3 ALTERNATIVES TO THE PROPOSED PROJECT

The California Environmental Quality Act (CEQA) requires analysis of potential Alternatives to the Project, including the "No Action" alternative. Potential Alternatives considered for this Project were:

1) No Action Alternative – this would be to not construct the Project on the Site, but to retain existing conditions of an undeveloped property, with casual parking of large trucks.

2) Location Alternatives – other locations may be considered under CEQA if feasible and which may result in lower levels of impact. Since the Project Applicant owns this parcel but does not own other suitable parcels in the area, other locations do not appear to be feasible and were not further considered in this Initial Study.

3) Density Alternatives – The Project could be constructed with a smaller building or another less dense alternative. This is discussed in the Applicable portions of the Environmental Checklist (Chapter 2.0) and the Summary of the Affected Environment and Impacts in Chapters 2.0 and 3.0 below.

This Initial Study document therefore analyzes the proposed Project, the No Project Alternative, and where applicable, changes in environmental impact which may occur under a reduced density scenario. A smaller facility of approximately 300,000 – 350,000 square feet of space has been selected for this comparison of density alternatives. While this selection is somewhat arbitrary, it has been chosen to provide a comparison of impacts for the Proposed Project with a project with a reduced footprint and less required parking.

Reduced Density Alternative

The analysis of potential Project Impacts indicates that the Project as designed will not result in potentially significant impacts, except potentially for biological impacts and traffic (VMT) impacts. Thus, the reduced density/footprint Alternative has been evaluated in terms of effects on biological resources (see Biological Resources, Section 3.4 and Transportation, Section 3.17).

No Action Alternative

For all environmental issues listed by CEQA regulations, the No Action Alternative will result in continuance of the current site conditions and will not result in any ongoing impact other than ongoing impacts from unauthorized dirt bike use, and unauthorized dumping. However, current stormwater conditions at the northwest edge of the Site are resulting in some periodic flooding, which would be directed to the proposed retention pond, with completion of the Proposed Project (thus reducing flooding impacts on the property to the north).

1.4 PURPOSE AND NEED FOR PROJECT

The City of Hesperia has been historically expanding in population and in industrial and commercial need and demand. In particular, facilities which provide warehouse space have been expanding in recent years.

This Project will provide warehouse type space for general commercial activities, storage, sorting and routing of products handled by Pixior for their clients. Those products appear to generally consist of apparel, shoes and accessories according to Pixior's website. The Project will help fulfill the need for these types of commercial warehouse facilities.

2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED (ENVIRONMENTAL CHECKLIST SUMMARY)

2.1 DETERMINATION OF SIGNIFICANCE

This Chapter provides a general assessment of Environmental Issues which may be affected by the proposed Project. The discussions focus on each issue in order to make a determination whether the Project can be categorized in one of four categories for each subject area of potential impact as follows:

1. Potentially significant
2. Not significant with properly implemented Mitigation Measures
3. No significant impacts anticipated (for the Proposed Project)
4. No Impact

In some cases, mitigation measures may have already been incorporated into the Project Planning process. These are reflected in the Project Site Plan in Figure 5 or described more fully in this Chapter (2.0) and in Chapter 3.0 of this Initial Study document.

The environmental factors checked in Table 1 below would be potentially affected by this Project. The unehecked boxes indicate environmental issues that are either non-significant or would generate No Impact. Those issues are discused briefly in this Chapter below to show the rationale for those determinations.

Chapter 3.0 contains more detailed analysis for issues which are considered to be Significant or which are considered Non-Significant with Mitigation. The Mitigation Measures for these issues are discussed in that Chapter and would need to be tied to a Mitigation Montoring Program (see Chapter 4.0) in order to be effective in reducing those areas to be "Less than Significant with Mitigaiton". In some cases, those Mitigation Measures have already been incorporated into plans for the Proposed Project.

2.2 SUMMARY OF ENVIRONMENTAL ISSUES

Table 1 summarizes the issues which are of potential significance for the proposed Project. A brief discussion of issues is listed below. Issues which are not potentially significant or which have been determined to have no impact are not further discussed, although the CEQA questions for those issues are shown in Chapter 3.0.

That chapter (3.0) also contains discussions of issues which are "Non-significant with Mitigation Incorporated" or those which are Potentially Significant. Mitigation measures are also listed for each issue which are intended to reduce impacts below the level of significance.

The Proposed Project is the main frame of reference for discussions of impacts resulting from each of the issues. Where applicable, any impacts from the No-Project Alternative or a Reduced Density Alternative (assume about 2/3 of the Project Density) are also discussed. Below are brief summary discussions of each major environemntal issue as specified by CEQA.

Aesthetics – This issue is expected to be **Non-Significant with Mitigation** Measures, many of which have already been incorporated into the plans for the Proposed Project. These are more fully discussed in Chapter 3.0.

Agriculture and Forestry – There is expected to be **No Impact** on Agriculture or Forestry. There is no agriculture or potential for agriculture on the Site and no forestry resources (Joshua Trees which are a protected species are a non-forestry tree species which are discussed in the section on Biological Resources). RCA & Associates, LLC (hereafter RCA) has completed a General Biological Resources Assessment of the Project Site (RCA 2020a) and has prepared a Joshua Tree Protection Study (Protected Plant Preservation Plan) for the Site (RCA 2020b).

Air Quality

Air Quality impacts are anticipated to be **Non-Significant with Mitigation**. An Air Quality and Greenhouse Gas Study has been performed for the Project (BlueScape Environmental 2021). That study included modelling of Air Quality and Greenhouse Gas emissions as per the state-approved emissions model. The findings of that report are further discussed in Chapter 3.0.

Biological Resources

Potential Project impacts on Biological Resources are expected to be **Non-Significant with Mitigation**. This is discussed in detail in Chapter 3.0 along with summary discussions of the Biological Reports compelted to date and additional biological work which will be necessary to properly mitigate impacts of the Project. RCA & Associates, LLC has prepared a General Biological Resources Assessment (RCA 2020a) and a Joshua Tree, Protected Plant Preservation Plan for the Site (RCA 2020b). Proposed mitigation will be implemented contingent on approval by the California Department of Fish and Wildlife.

Cultural Resources

Cultural Resources (inlcuding Historic Resources) as well as Tribal Cultural Resources (see Section below) are anticipated to be **Non-Significant with Mitigation**. These resources have been studied by Alta Archaeological Consultants (2020) and are discussed in Chapter 3.0.

Geology/Soils

Geology and Soils are anticipated to be **Non-Significant with Mitigation**. Reports including a Soils Engineering Investiaton (AGI 2020a) and Percolation Testing Results (AGI 2020b) have been prepared by A.G.I. Geotechnical, Inc. These are discussed in Chapter 3.0.

Greenhouse Gas Emissions

Greenhouse gas emissions have been calculated by BlueScape Environmental (2021). These emissions are anticipated to be **Non-Significant with Mitigation.** This is further discussed in Chapter 3.0.

Hazards and Hazardous Materials

Hazards and hazardous materials are expected to be **Non-Significant with Mitigation**. This is discussed in more detail in Chapter 3.0.

Hydrology/Water Quality

Hydrology and Water Quality are expected to be **Non-Significant with Mitigation**. A Preliminary Hydrology Report and a Preliminary Water Quality Management Plan have been prepared by David Evans and Associates, Inc. (hereafter DEA) and submitted to the City of Hesparia. These reports (DEA 2020a,b) and site conditions pertinent to hydrology and water quality are further discussed in Chapter 3.0.

Land Use Planning

Land Use issues are expected to be **Non-Significant with Mitigation**. This is discussed further in Chapter 3.0.

Mineral Resources

The effect of the Project on mineral resources is expected to be **No Impact**. No mineral resources are known to exist on the site, and any extraction of resources in such a developed area would not likely be allowed by the City.

Noise

Noise effects of the Project are expected to be **Non-Significant with Mitigation**. This is further discussed in Chapter 3.0.

Population/Housing

The effect of the Project on population or housing is expected to be **Non-Significant**. The Project will not create any housing or increase population. The creation of a small number of permanent jobs following construction of the facility could have a minor and indirect upon demand for additional housing in the area over a period of time.

Public Services

Public Services will not likely be significantly affected and the effects are expected to be **Non-Significant with Mitigation**. This is further discussed in Chapter 3.0.

Recreation

The Project effect on recreation is expected to be **No Impact**. The Project will not supply any recreational facilities nor will it increase demand for such facilities.

Transportation/Traffic

The Project effect on transportation and traffic Level of Service (LOS) is expected to be **Non-Significant with Mitigation**. David Evans & Associates (DEA 2021) has produced a Focused Traffic Impact Study fro the Pixior Warehouse Project. Findings of that study are further discussed in Chapter 3.0.

A Vehicle Miles Travelled (VMT Study has indicated that VMT impacts may be **Potentially Significant and Unavoidable** according to City of Hesperia criteria, but less than significant on a regional or County level, if the facility is utilized to its fullest extent with 296 employees. Such a scenario could also increase Air Quality and Greenhouse gas emissions, however, those emissions have been calculated to be **Less Than Significant with Mitigation Incorporated**..

The workforce proposed by the Applicant is only approximately 30-35 workers. This lower number of employees and use of the facility mainly for storage would likely reduce the facility impacts to **Non-Significant with Mitigation** for VMT, however, the City of Hesperia must evaluate projects based on all potential uses for each facility. Permit conditions for the Prixior Warehouse will be determined by the City of Hesperia. This is further discussed in Chapter 3.0.

Tribal/Cultural Resources

Potential Impacts on Tribal Cultural Resources are expected be **Non-Significant with Mitigation**. The findings of the Alta Archaeological Survey Report (Alta 2020) are further discussed in Chapter 3.0.

Utilities/Service Systems

The effect of the Project on Utilities/Service Systems is expected to be **Non-Significant with Mitigation**. This is further discussed in Chapter 3.0.

Mandatory Findings of Significance

The effect of the Project on the several categories of "Mandatory Findings of Significance" are **Less Than Significant with Mitigation Incorporated**. This is further discussed in Chapter 3.0. It should be noted, however, that continuing development in the area could result in a Cumulative Impact in several areas (Biology. Land Use, Hydrology, Aesthetics, Air Quality, Greenhouse Gases etc.) if many future projects in the City do not set aside any significant open space on commercial and residential Sites and limit potential transportation impacts.

3.0 ENVIRONMENTAL CONDITIONS AND POTENTIAL IMPACTS

This Chapter discusses Environmental Conditions (Affected Environment) and potential Impacts of the proposed Project. This is based on the Environmental Checklist findings (see Chapter 2.0). Only those CEQA questions and issues which received a finding of "Potentially Significant Impact" or a finding of "Less Than Significant Impact with Mitigation" are discussed in this Chapter. Findings of "Less than Significant Impact" or "No Impact" are not discussed unless they relate to other issues which do have potential significant impacts.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized 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?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

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

The Project site is located in the City of Hesperia, which lies on relatively flat topography. According to General Plan exhibit OS-6, Scenic Resources, the Project site is located within a view corridor of the Oro Grande Wash, The San Gabriel Mountains, San Bernardino Mountains, and the surrounding Victor Valley, however these views are common throughout the City of Hesperia and the proposed project would not substantially block views of these mountains or surrounding Victor Valley. Due to the intervening development and their distance and orientation to the Project site, prominent, distinct views of the San Bernardino Mountains, San Gabriel Mountains, surrounding Victor Valley, and the Oro Grande Washes are available for public viewing areas abutting the Project site under existing conditions (City of Hesperia General Plan 2010). Also, an existing warehouse building to the north already blocks local north-south views and the Interstate 15 freeway lies to the west. Accordingly, Implementation of the proposed Project would not have a substantial adverse effect on a scenic vista, and **Less-Than-Significant Impacts** would occur.

(Source: City of Hesperia General Plan, 2010)

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

The Project site is not located within or adjacent to a scenic highway corridor and does not contain scenic resources, such as trees of scenic value, rock outcroppings, or historic buildings. There are no State-designated or eligible scenic highways within the vicinity of the Project site. The Site lies adjacent to a commercially developed area of Interstate 15. The nearest State-eligible scenic highway from the Project site is a segment of Route 138 approximately 22 miles southeast of the Project site.

Accordingly, the Project site is not located within a state scenic highway corridor and implementation of the proposed Project would not have a substantial effect on scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor. Therefore, **No Impact** would occur, and no further analysis is required on this subject.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Implementation of the proposed Project would result in the visual conversion of the site from a juniper community with native flora to a commercial/ Industrial business park (CIBP) consisting of a warehouse that will include approximately 444,000 ft^2 building with driveways and adjacent asphalt parking areas, a trash enclosure, guard shacks, and advertising sign. The Project is located in an area designated for commercial and industrial business parks (CIBP). It is located immediately to the south of a large warehouse building (toy warehouse) which is also consistent with that zoning.

The Project will comply with all pertinent design requirements of the Zoning code, to assure quality site design and building architecture that is well constructed. This includes the installation of landscaping, undulating and decorative screening walls and facades, window fenestration, and varying roof design. Development of the proposed project will improve the overall character of the area by introducing high-quality design.

Mitigation Measure

AES-1 The building and accessory elements will be integrated with the same office exterior elevation architectural theme and color palette will unify the entire business park into a cohesive master plan along with the landscape palette. The proposed building will be tilt-up walls with a concrete slab-on construction.

The Project will be compatible with size, scale, height, and aesthetic qualities of other developments planned and constructed in the vicinity of the Project site and would be required to comply with the applicable development standards and design guidelines contained in the City of Hesperia Zoning Ordinance; therefore **Less-Than Significant Impacts with Mitigation** will occur if these design standards are correctly followed.

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

City of Hesperia Municipal Code Section 16.16.415 includes design standards for outdoor lighting that apply to industrial development in the city. Development of the proposed project will require installation of outdoor lighting necessary for public safety and maintenance, as well as to accommodate nighttime business operations. All lighting will comply with the development standards contained in the City's Zoning Code. The commercial development located north of the Project does contain lighting on the outsides of the buildings that are visible from the project site.

The Municipal code lighting standards govern the placement and design of outdoor lighting fixtures to ensure adequate lighting for public safety while also minimizing light pollution and glare and precluding nuisance (e.g., blinking/flashing lights, unusually high intensity or needlessly bright lighting). Therefore, **Less Than Significant Impacts with Mitigation** will occur.

Mitigation Measure

AES-2 The proposed project would involve the introduction of new lighting typically associated with business parks. This lighting would be similar to that which exists in the adjacent business park and surrounding area. The Project design standards will be met as well as provisions of the City Code and will therefore not be considered significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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

As discussed in Chapter 2.0, there are no agricultural or forestry resources at the Site and the Project will have **No Impact** on these resources.

3.3 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:

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

The Project Site is located within the Mojave Desert Air Quality Management District (MDAQMD), comprised of San Bernardino County's High Desert and Riverside County's Palo Verde Valley. Air monitoring staff operates and maintains six monitoring stations (Barstow, Hesperia, Phelan, Trona, Twentynine Palms, & Victorville) within the District's 20,000 + mile jurisdiction.

The High Desert's proximity to SCAB and the prevailing southwest winds that transport pollutants from more congested urban areas south of the Cajon Pass into the region causes concern over ground-level ozone impacting ambient air. Violations of the federal ozone standard occur several times each summer, as do violations of the state standard for particulate matter (PM10), usually in the fall and winter.

The MDAQMD has a high potential for air pollution at certain times of the year. This is due to its proximity to the heavily populated South Coast Air Basin (SCAB), which houses the highly polluted Los Angeles region and the San Bernardino Valley, as well as the regional climate (warm with little precipitation). Another significant pollutant combination, more recently studied and legislated in California, are Greenhouse Gases (GHG) which are believed to contribute to global climate change. GHGs will be discussed in a subsequent section (Section 3.8).

Air Quality & Criteria Pollutants

Air quality is the measured concentration of pollutants in the atmosphere. Concentrations are expressed in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$). Both National and State standards have been promulgated for six criteria pollutants (National Ambient Air Quality Standards and California Ambient Air Quality Standards) and are managed by the U.S. Environmental Protection Agency (EPA) and the California Air Resource Board (CARB) respectively. The six criteria pollutants are Particulate Matter (PM_{10} and $PM_{2.5}$), Sulfur dioxide (SO_2), Carbon Monoxide (CO), Ozone (O_3), nitrogen dioxide (NO_2) and lead (Pb). PM_{10} and $PM_{2.5}$ refer to particulate matter smaller than 10 and 2.5 microns (micro-meters) respectively.

Air quality control districts are classified as "attainment" or "non-attainment" areas depending on whether they meet the respective state and federal air quality standards. The Project Site is located in the southwest section of the MDAQMD. The high desert area of this air district is currently designated "non-attainment" for Ozone and PM_{10} according to the most recent Mojave Desert Air Quality Management Plan (MDAQMD 2016) (Table 2).

CARB also set significance thresholds for four additional pollutants: Visibility reducing particles, sulfates, Hydrogen sulfide (H_2S) and Vinyl chloride. CARB also identifies other air pollutants as toxic air contaminants (TACs) which are pollutants that may cause serious, long-term effects, such as cancer, even at low levels (CARB 2016). These standards can be found in Table 3.

Criteria Pollutants from Project Construction

Construction activities produce many types of the emissions and pollutants listed above. However, the pollutants of greatest concern are PM_{10} and $PM_{2.5}$ in fugitive dust and diesel engine exhaust. Fugitive dust emissions can result from a variety of construction activities such as excavation, grading, vehicle exhaust, vehicle travel to and from the site, and demolition. These emissions can greatly increase localized concentrations of PM_{10} and $PM_{2.5}$, as well as affecting compliance with ambient air quality standards on a regional level (see Table 4).

Particulate emissions can lead to adverse health effects as well as limiting visibility and contaminating exposed surfaces. Gas and diesel engines can also contribute to increased levels of nitrogen dioxide, carbon monoxide, reactive organic gases (ROC) and diesel particulate matter (DPM). DPM is a composite of TACs which also cause significant negative health effects. Use of architectural coatings and other materials during the finishing phases of the project may also emit ROGs and TACs.

The MDAQMD's approach to CEQA analysis of fugitive dust impacts is to require implementation of effective and comprehensive dust control measures rather than to require detailed quantification. This is because fugitive dust emissions can vary dramatically depending on the level of activity and equipment, and the length of time construction occurs. Despite the varied emission levels from project to project, there are several feasible control measures that are considered reasonable to implement to significantly reduce fugitive dust emissions from construction. These control measures are comprised of Best Management Practices (BMPs) such as frequent water application to the site and a reduction of vehicle idling while not in use. It has been determined that most projects that implement these practices constitute sufficient mitigation to reduce PM_{10} and $PM_{2.5}$ impacts to a level which is **Less Than Significant with Mitigation Incorporated** (MDAQMD 2020).

BlueScape Environmental (2021) has conducted Air Quality Emissions Modelling utilizing the CalEEMod methodology. Maximum Daily and Maximum Annual Emissions with Mitigation Control Measures incorporated are shown in Table 5A and 5B. As shown, all calculated daily and annual emissions will be below Air Quality Thresholds for VOC, NO_x, CO, SO_2, PM_{10} and $MP_{2.5}$. These tables demonstrate that the Project will result in impacts on Criteria Air Pollutants which are **Less Than Significant with Mitigation Incorporated**. The Mitigation Measures include compliance with MDAQMD Rule 403 regarding fugitive dust. Air Quality Mitigation Measures are described below for both construction and operational mitigation.

Criteria Pollutants from Project Operation

The project operation phase refers to activities that occur after the completion of project construction and when the project is functioning in its intended use. These activities are varied and are dependent on the type of daily operations that may generate criteria pollutants. For most commercial and residential projects, motor vehicle traveling to and from the site represents the primary source of air pollutant emissions. For industrial and some commercial projects, activities of greatest concern are typically manufacturing processes and equipment operation. Emissions from protective coatings and landscaping equipment also may be important. CEQA significance

thresholds address the impacts of operation emission sources on local and regional air quality. Thresholds are also provided for other potential impacts related to project operations, such as odors.

A traffic study was conducted by David Evans & Associates, Inc. (DEA 2021) which estimates that as many as 780 vehicle trips per day could occur as a result of this project. A percentage of these vehicle trips will be by diesel powered trucks.

Additional data has been provided by the applicant, indicating that actual usage of the facility will be lower in traffic, due to the proposed Project warehouse being used mainly for storage. This will likely utilize a smaller workforce (30-35 employees) than that indicated by the Site Plan (showing 232 parking spaces for passenger vehicles). Also, the expected number of trucks per day is 7-9 trucks for the early shift (6:00 AM – 2:45 PM) and 4-6 trucks during the second shift (2:30 PM – 7:00 PM). This will be far fewer than indicated by the roughly 60 truck bays indicated in the Site Plan.

This would reduce air quality impacts significantly from those which would normally be associated with a facility of this size. However, the City of Hesperia regulates facilities based on their maximum potential use. Therefore, Traffic Impacts and Air Quality Impacts have been calculated using the maximum number of employees and parking spaces (DEA 2021) and BlueScape Environmental 2021).

Emissions for full operation of the Project were calculated using CalEEMod modelling as shown in Table 6A and 6B. As shown, both daily and annual emissions fall well below the MDAQMD Thresholds for ROG, NO_x, CO, SO_2, PM_{10} and $PM_{2.5}$. The project impacts are therefore anticipated to be **Less Than Significant with Mitigation** for Air Quality.

Additional discussion of potential impacts from the Project on Traffic and Transportation Area discussed in Section 3.17 below. The number of actual employees, and therefore vehicle trips and Vehicle Miles Travelled could alter the degree of impact on Air Quality and Greenhouse Gas emissions. At full use, the facility would likely generate sufficient air pollutants to require modeling using approved emissions models (CalEEMod).

Proposed Mitigation Measures for construction and operation of the facility are as follows:

Mitigation Measures

AQ-1 During Project Construction, comply with an accepted Dust Control Plan to be prepared and submitted to the MDAQMD for approval. This Plan shall comply with Rule 403 including periodic watering, cover loaded haul vehicles, prevent trackout of soils onto paved surfaces, reduce earth-moving activity during high wind conditions, construct paved areas first, and maintain existing topography to the extent possible. Also comply with MDAQMD Rule 401 (visible emissions) and 402 (nuisance emissions).

AQ-2 During Project construction and operation, limit idling of diesel vehicles to less than 10 minutes. For Project operation, this time limit applies once the vehicle has been parked for unloading and loading.

AQ-3 The employees should be encouraged to ride-share to the extent feasible. Local employees should be encouraged to utilize public transportation when available. Such actions could potentially reduce levels and impacts for Vehicle Miles Travelled.

AQ-4 Use low VOC emitting architectural coatings (including compliance with MDAQMDD Rule 1113). Also use low VOC cleaning supplies. Maximize use of electrical landscaping equipment when feasible.

AQ-5 BlueScape Environmental (2021) indicates that the facility will utilize 1,500 kw of on-site generated solar power and thus reduce Air Quality impacts normally associated with power generation. This is also discussed on the section on Energy (Section 3.6)

The above data and studies, combined with the project size and baseline air quality of the area, leads RCA & Associates to conclude that the potential impacts will be **Less Than Significant with Mitigation Incorporated**. This conclusion is based upon specific air modeling results developed by BlueScape Environmental (2021) and specific Mitigation Measures provided in BlueScape Environmental (2021) and listed and summarized in the Air Quality section above.

3.4 BIOLOGICAL RESOURCES

Would the Project?

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

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?

The California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife services (USFWS), California Native Plant Society (CNPS), and other local agencies, maintains a list of special status species, legally protected or considered sensitive by CDFW, USFWS, CNPS, and other local agencies. To be considered a special status species, a species must: be listed as either rare, endangered or threatened by under the deferral or state endangered species act, listed as a candidate under either state or federal law, considered a species of special concern, protected by the Migratory Bird Treaty Act, or protected under local planning documents.

A literature search was performed on the CDFW's Natural Diversity Data Base (CNDDB) for the Hesperia, California USGS 7.5 minute quadrangle to determine the special-status species recorded in the area. Currently, ten wildlife species and three plant species are considered special status in the Hesperia USGS quadrangle. These species include Cooper's hawk (*Accipiter cooperii*), pallid bat (*Antrozous pallidus*), long-eared owl (*Asio otus*), burrowing owl (*Athene cunicularia*), white-pygmy-poppy (*Canbya candida*), Booth's evening-primrose (*Eremothera boothii ssp. boothii*), short-joint beavertail (*Opuntia basilaris var. brachyclada*), coast horned lizard (*Phrynosoma blainvillii*), yellow warbler (*Setophaga petechia*), Mojave tui chub (*Siphateles bicolor mohavensis*), Le Conte's thrasher (*Toxostoma lecontei*), gray vireo (*Vireo vicinior*), and Mohave ground squirrel (*Xerospermophilus mohavensis*).

A biological assessment was conducted on the property on January 29, 2020 by Randall Arnold, a biologist from RCA Associates, Inc. to assess for special status species. The site contains a mixed desert shrub community that supports vegetation such as California Juniper (Juniperus *californica*), Nevada joint-fir (*Ephedra nevadensis*), rubber rabbitbrush (*Ericameria nauseosa*), California buckwheat (*Eriogonum fasciculatum*), and Joshua tree (*Yucca brevifolia*).

The Joshua tree is a protected plant in the County of San Bernardino under the Native Desert Plant Protection Plan. On September 22, 2020, CDFW has listed the western Joshua tree as a temporary endangered candidate for one year until a final decision is made and is therefore illegal to remove or transplant without a permit.

A Joshua Tree Protected Plant Preservation Plan (PPPP) has been conducted (RCA 2020b) and will be implemented before breaking ground. Implementation of the PPPP will require completion and issuance of an Incidental Take Permit by the California Department of Fish and Wildlife. The PPPP found 162 Joshua Trees on the site, 79 of which were deemed to be transplantable (generally less than 12 feet in height) and 83 of which were deemed not transplantable.

With current site design, only 8-10 of the non-transplantable Joshua Trees appear to be within the landscape strips and the northwestern area (which will be left for stormwater treatment). While these few plants can be saved, an incidental take permit would require that over 70 non-transplantable Joshua Trees be eliminated and there would be limited space to transplant trees on the Project Site. Additional space for Joshua Trees could be provided with implementation of a somewhat smaller facility (as per the reduced density Alterative). This would also provide additional space for preservation and transplant of Joshua Trees. Decisions on the type and degree of such mitigation will be the purview of CDFW in issuing an Incidental Take Permit.

A focused survey was also conducted on the site to determine the presence or absence of burrowing owls, desert tortoise, and Mojave ground squirrels. Based on the findings of the survey, there are no suitable burrows or other signs (scat, feathers, footprints) to suggest desert tortoises or burrowing owls are occupying the area. No Mojave ground squirrels were detected on the site, although there are suitable burrows, there have been no recent sightings due to the surrounding urbanization, and it is not expected to occur. A burrowing owl survey will be completed within 30 days prior to commencement of Project construction.

Mitigation Measures:

BIO-1 If project activities are planned during bird nesting season (February 1 to August 31), a nesting bird survey shall be conducted within thirty days prior to any ground-disturbing activities, including, but not limited to clearing, grubbing, and/or rough grading to ensure birds protected under the Migratory Bird Treaty Act (MBTA) are not disturbed by on-site activities. The survey will be conducted by a qualified biologist. If nesting bird activity is present, based on the species, a no disturbance buffer zone shall be established around each nest. If there is no nesting activity, then no further action is need for this measure.

BIO-2 Prior to the issuance of a grading permit, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation , State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 14 days prior to the beginning of project construction, and a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains suitable burrowing habitat and to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present, no additional actions related to this measure are required. If occupied burrows are found within the development footprint during the pre-construction clearance survey, Mitigation Measure BIO-3 shall apply.

BIO-3 If occupied burrows are found within the development footprint during the pre-construction clearance surveys, site-specific buffer zones shall be established by the qualified biologist through consultation with the California Department of Fish and Wildlife (CDFW). The buffer zones may vary depending on burrow location and burrowing owl sensitivity to human activity, and no construction activity shall occur within a buffer zone(s) until appropriate avoidance and minimization measures are determined though consultation with CDFW.

Through implementation of Mitigation Measures BIO 1-2, impacts to species identified as a candidate sensitive, or special-status would be reduced to **Less Than Significant Levels with Mitigations Incorporated**.

b) Have a substantially 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?

The site does not contain a riparian habitat that is subject to CDFW, USFWS, United States Army Corps of Engineers, nor the Regional Water Quality Control Board (RWQCB).

As previously mentioned, the site contains the western Joshua tree *(Yucca Brevifolia)* which is a county and city protected native desert plant that has also recently been granted a one-year temporary endangered status on September 22, 2020 by CDFW, until a final decision is to be made in 2021. A permit is required by CDFW to relocate a Joshua tree once a Native Desert Plant Protection survey, to determine the condition of the Joshua trees, has been conducted prior to construction. Therefore, development on the site will create a loss of Joshua trees. Mitigation Measures BIO-4shall be implemented in accordance with protection of the Joshua trees.

BIO-4 Implementation of the Joshua Tree Protected Plant Preservation Plan and the subsequent issuance of an Incidental Take Permit by CDFW should include coordination with the City of Hesperia and CDFW to determine if impacts can be fully mitigated. Other means of allowing preservation of natural space on or off the Site should also be investigated and implemented to the extent feasible.

Prior to any on site construction activates, the project proponent shall retain a qualified biologist to assess the condition of Joshua Trees to be transplanted (size, bark damage, location, etc.) which have been identified in the Protected Plant Preservation Plan (RCA 2020b). An Incidental Take Permit will need to be acquired from CDFW before relocating any Joshua Trees.

Following approval of relocating, the project proponent shall retain a qualified Transplantation contractor with a successful track record of Joshua tree transplantation. Transplanted trees shall be watered a week before with a metal tag placed on the north facing to orient the tree during relocation.

BIO-5 To ensure that the transplanted Joshua trees are kept in compliance with the Joshua Tree Relocation Plan, the transplanted Joshua trees will be evaluated quarterly prior to final landscape planting. A "Special Inspector" is required to monitor all Joshua tree transplantation activities. The Special Inspector shall be an International Society of Arboriculture-certified arborist or registered botanist qualified to assess the progress and success of the transplantation effort and to recommend corrective measures, if needed. This mitigation shall be in accordance with terms of the Incidental Take Permit issued by CDFW. Recommended mitigation includes:

- Monitoring for survival, appearance, and function of all transplanted Joshua trees will be completed quarterly. General compliance with this Plan will also be monitored.

- As part of the quarterly inspections, the Special Inspector will make note of the general health of the transplanted Joshua trees and will make maintenance recommendations, if necessary.

Although the site does not contain any sensitive riparian areas, due to the presence of the Joshua trees being a temporary special status species, implementation of Mitigation BIO 4 impacts to sensitive natural communities within the project would be **Less Than Significant Level with Mitigation Incorporated**.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No drainage features, ponded areas, wetlands, or riparian habitat subject to jurisdiction of the USACE, who regulate discharges of dredge or fill material into water off the U.S including wetlands and non-wetlands bodies of water, were found on the project. Therefore, the proposed project will have no effects on federally protected wetlands as defined by Section 404 of the CWA. Therefore, **No Impact** would occur, and no mitigation is required.

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

Habitat fragmentation occurs when a single, contiguous habitat area is divided into two or more areas, or where an action isolates two or more new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or to/from one habitat type to another. Habitat fragmentation may occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. Examples of migration corridors may include areas of unobstructed movement for deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds.

The project site is located in an area of encroaching development and has been regionally isolated from expanses of natural open space by I-15 located 80 feet to the east and by the California Aqueduct located 1,500 feet to the northeast to the east. As a result, the project site does not provide for regional wildlife movement or serve as a regional wildlife corridor. Additionally, the site does not contain nursery sites, such as bat colony roosting sites or colonial bird nesting areas. Although the project does have potential to affect migratory birds, implementation of Mitigation Measures BIO-1 through BIO-3 would ensure development of the project site would not significantly affect wildlife movement opportunities, established native resident or migratory wildlife corridors, or native wildlife nursery sites. Therefore, impacts to wildlife corridors or linkages would be reduced to **Less Than Significant with Mitigation** incorporated.

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

The City of Hesperia has a Protected Plant Ordinance as a means of managing the preservation of trees and native desert flora, where necessary. Construction activities, including grading, vehicle access, equipment staging area, development of access roads, and construction-related activities have the potential to result in temporary impacts to desert flora within the project.

The Project site does contain Joshua trees within the project boundaries and surrounding areas, and therefore is subject to Chapter 16.24 of the City's Municipal Code, established to comply with the CDNPA, which protects non-listed native desert, such as Joshua trees. As stated previously, a Joshua Tree Relocation Plan has been prepared to comply with Chapter 16.24 of the City's Municipal Code (RCA 2020b). A permit from the City and CDFW will be required prior to any relocation of Joshua trees. Through adherence to City Municipal Code Chapter 16.24 – Protected Plants with implementation of Mitigation Measures BIO-4 and BIO-5, impacts to biological resources by local policies or ordinances and new requirements from the State of California would be **Less Than Significant with Mitigation** incorporated.

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

The project is within the California Desert Conservation Area Plan 1980 (CDCA). Amendments to the CDCA include the Western Mojave Desert Habitat Conservation Plan known as the Western Mojave Plan (WMP) and the Desert Renewable Energy Conservation Plan (DRECP).

Pursuant to Section 10 of the Federal Endangered Species Act, the City, along with Bureau of Land Management (BLM), County of San Bernardino, and other local jurisdictions, is in the process of approving the WMP. The WMP would provide protection for the desert tortoise, Mohave ground squirrel, and over 100 other sensitive plants and animals for which they are a part of within the Mojave Desert. The final Environmental Impact Report/ Environmental Impact Statement (EIR/EIS) for the WMP was disseminated to the public in 2005, the BLM issued a Record of Decision for the WMP in 2006, and the WMP has been challenged numerous times by various conservation groups and off-highway vehicle (OHV) organizations since then. The BLM released a Supplemental EIS for the WMP in 2015, but as of December 2020, the WMP has not been adopted, so the project will not conflict with the WMP.

The DRECP is focused on 22.5 million acres in the desert regions and adjacent lands to seven California counties: Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego. It is a landscape-level plan that streamlines renewable energy development while conserving unique and valuable desert ecosystems and providing outdoor recreation opportunities. The BLM signed the Record of Decision approving its Land Use Plan Amendment on September 14, 2016, completing Phase 1 of the DRECP, which covers 10

million acres of BLM-managed lands in DRECP plan area in support of the overall renewable energy and conservation goals of the DRECP. The project site is not within a DRECP renewable energy development focus area; therefore, project will not conflict with the DRECP.

The proposed project would not conflict with an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan applicable to the project. **No Impact** would occur, and no mitigation is required.

3.5 CULTURAL RESOURCES

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of the historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of dedicated cemeteries ?	☐	☒	☐	☐

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

No known historical resources occur in the Project Area, however, pursuant to CEQA requirements, a comprehensive cultural resources study was conducted on the site by Alta Archaeological Consulting, LLC (ALTA) personnel (Dean Martorana, RPA). As part of the study, a California Historical Resources Information System (CHRIS) records search was obtained at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton campus.

The cultural study is part of the environmental review process for the proposed project as per CEQA, Section 21000 et. seq. The purpose of the Phase I cultural study was to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any cultural resources, as defined by CEQA, that may exist in or around the project area. In addition to the data search conducted at SCCIC, ALTA cultural staff contacted Native American representatives to inform them of the project and to request their comments regarding potential cultural resources on the site and surrounding area. Following the data search conducted at SCCIC, an intensive field survey was conducted by Dean Martorana and his team on March 13, 2020.

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. The State of California, through the State Historic Preservation Office (SHPO), also maintains an inventory of those sites and structures that are considered to be historically significant known as the California Register of Historic Resources (CRHR). Finally, the U.S. Department of Interior has established specific guidelines and criteria that indicate the manner in which a site, structure, or district, is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places (NRHP). A property may be historic if it is old enough to be considered historic (generally considered to be at least 50 years old and appearing the way it did in the past).

No cultural resources of any kind were noted within the Project boundaries. Sixteen shovel-test pits were excavated, on the Property, every 100 meters on the pedestrian transects. These pits did not yield any material of historic or prehistoric origin that could be considered cultural resources.

Due to restrictions on using the repository directly during the COVID-19 mandatory shelter in place period, a cultural resource records search request was made on March 9, 2020 for the Project site and immediate surrounding area within a quarter mile radius, to the SCCIC only provided data that had been previously digitized, which was not complete at the time of this records search, which as a result, some of the data returned incomplete. The data received and provided by SCCIC showed no historical landmarks or points of interest present in the Project area, and no National Register listed, or eligible properties are located within a quarter mile of the Project site. However, two cultural resources were noted within a quarter-mile of the Project (P-36-021366 and -021351), and 12 previous cultural resource reports (SB-00986, -01025, -01026, -1027, -2202, -2476, 02803, -06652, -04975, -06333, -07156, and -07971) had been completed within a quarter-mile buffer surrounding the Project site.

Although, the proposed project would not cause a substantial adverse change in the significance of known archaeological resource pursuant to CEQA Guidelines §15064.5 or an identified tribal cultural resource pursuant to PRC §21082.3, there is a potential for project-related construction to impact unknown or previously unrecorded archaeological resources. For this reason, Mitigation Measures CR-1, CR-2, CR-3, and CR-4 are proposed in the event that cultural resources are inadvertently encountered during excavation activities.

Data from the records search revealed that there are no cultural resources that had been recorded within the Project area. In addition, the project site is undeveloped and there are no features present on the site. Also, the site was not identified as containing any historic resources according to the City's General Plan EIR. With the incorporation of Mitigation Measures CR-1, CR-2, CR-3, and CR-4 the impacts will be **Less Than Significant with Mitigation Incorporated**.

b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5?

As previously stated, there are no known historical resources at the Project Site. According to the Hesperia General Plan EIR, the property is not part of a known Native American village complex and the site has not been identified as a location of any prehistoric resources. The majority of prehistoric archaeological resources are usually found in sensitive areas that include parts of the Oro Grande wash and the un-named wash adjacent to Interstate 15 (City of Hesperia, General Plan EIR). In addition, data received from CHRIS combined with the intensive field investigations did not identify any cultural resources.

In the event archaeological resources are found during construction activities, a qualified archaeologist should be contacted to assess the significance of the find. If applicable, all artifacts discovered at the development site shall be inventoried and analyzed by the professional archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find shall stop and the project proponent and project archaeologist shall notify the City of Hesperia and local Tribal representatives. For more detail refer to response V. (a).

Based on the data provided from CHRIS and field investigations, construction of the proposed project would not cause a substantial adverse change to any archaeological resource pursuant to 15064.5 and with implementation of Mitigation Measures CR-1, CR-2, CR-3, and CR-4 impacts are considered **Less Than Significant with Mitigation Incorporated**.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

There are no known paleontological resources at the Site, which lies in a developing commercial area of Hesperia. The Hesperia General Plan does not identify any such resources at the Site. The Site also does not appear to have any unique geological features and no such features were identified in the Soils Engineering Investigation for the Site (A.G.I. Geotechnical 2020).

A Phase I Cultural Resources Assessment was prepared by Alta Archaeological Consulting, LLC (ALTA) for the proposed project (ALTA, 2020). Field survey investigations conducted on March 13, 2020 by ALTA did not identify any cultural resources, including prehistoric/ historic archaeological remains or historic buildings within the Project boundaries, however, this study did not address paleontological resources, but focused on human resources. Shovel-test pits excavated on the property did not yield any subsurface cultural remains. A cultural resources records search was conducted by (SCCIC) which showed that no cultural resources had been previously recorded on the Project property.

The NAHC conducted a Sacred Lands File Search and provided a list of potentially interest parties and affiliated Native California individuals and groups to contact. The Sacred Lands File Search yielded positive results for cultural resources in the general project area. A list of Native American Tribes affiliated with the general area were contacted vis email. Quechan

Tribe of the Fort Yuma Reservation replied by email to indicate that the tribe did not wish to make any comments on the project at this time. San Manuel Band of Mission Indians responded via email provided additional guidance on the tribal concerns for the area, and also clarified that the positive sacred land result provided by the NAHC was triggered by a site within on the Baldy Mesa quadrangle and is not near the project area.

If previously undocumented cultural resources are identified during the earth moving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation is necessary. If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner of his/her representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. With the implementation of Mitigation Measures CR-1, CR-2, CR-3, and CR-4 below would reduce potential impacts to a **Less Than Significant with Mitigation Incorporated** level.

Based on the analysis and evaluation of the available data, the proposed project would be considered **Less Than Significant with Mitigation Incorporated** to any unique paleontological resource or site or any unique geologic features.

d) Disturb any human remains, including those interred outsides of formal cemeteries?

Based on the cultural resource records reviewed, the site does not contain a known cemetery and is not expected to contain any human remains, including those interred outsides of formal cemeteries. There are no indications of a formal cemetery or informal family cemetery on the site. However, the potential exists for previously unknown human remains to be discovered at the site during project construction activities.

In the event that human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery.

The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that the project proponent and the MLD are in a disagreement regarding the disposition of the

remains, State law will apply, and the decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)). With the implementation of Mitigation Measures CR-1, CR-2, CR-3, and CR-4 the project will minimize possible impacts. Therefore, impacts are expected to be **Less Than Significant with Incorporated Mitigation Measures**.

Mitigation Measures

CR-1 If previously unidentified cultural resources are encountered during project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist should be contacted to evaluate the situation. Project personnel should not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

CR-2 If human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and further recommendations regarding treatment of the remains is provided.

CR-3 If paleontological resources are encountered during the course of ground disturbance, work in the immediate area of the find shall be redirected and a qualified paleontologist shall be retained to assess the find for scientific significance. If determined to be significant, the fossil shall be collected from the field. The paleontologist may also make recommendations regarding additional mitigation measures, such as paleontological monitoring. Scientifically significant resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a museum repository. If scientifically significant paleontological resources are collected, a report of findings shall be prepared to document the collection. This measure shall be implemented to the satisfaction of the City Planning Department.

CR-4 A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Hesperia prior to building final.

3.6 ENERGY

Would the project?

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

The Project Applicant has indicated that several Mitigation Measures to reduce energy consumption have already been incorporated into the Project. These include:

Mitigation Measures (Incorporated into current Project Design)

ENGY-1 Use of glass materials on the front of the office areas to allow natural daylight in work areas.

ENGY-2 Numerous skylights in the warehouse area to allow natural daylight use.

ENGY-3 Use of motion activated lighting in the warehouse area to reduce energy use at night.

These measures will substantially reduce energy use by the Project and are sufficient to allow a finding of **Less Than Significant with Mitigation Incorporated.**

However, the Project has the potential for renewable energy generation (e.g., solar) to serve its own needs and the applicant has proposed 1,500 kw on-site solar power. Solar cells will be placed on 400,000 square feet of the building roof and will be designed into the Project. Since even without this design, the project will consume substantially reduced amounts of energy for a structure of this type and usage the following measure (ENGY-4) could potentially reduce the Project to **No Impact**.

ENGY-4 Coordinate with local utility to determine optimal design for the proposed 1,500 kw solar power generation (in coordination with the City of Hesperia). Incorporating this roof-mounted solar farm into Project design, for installation during project construction.

3.7 GEOLOGY AND SOILS

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground shaking?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? Seismic-related ground shaking?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial director indirect risks to life or property?	☐	☒	☐	☐
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 wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

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.

The Project site is not located in an Alquist-Priolo Earthquake Fault Zone. The nearest significant active fault zones are the San Andreas fault zone and the Cleghorn fault zone, which are approximately 12.16 and 9.63 miles away from the subject site, respectively. There are no known faults located directly on the Project site; therefore, the potential that the proposed Project could expose people or structures to adverse effects related to ground rupture is **Less Than Significant.**

(Source: City of Hesperia, 2020; A.G.I. Geotechnical Inc., Soils Engineering Investigation, 2020; Department of Conservation Map Server, 2018.)

ii) Strong seismic ground shaking?

The site is located in a seismically active area of Southern California. Due to its location in the region, the Project Site is expected to experience moderate to severe ground shaking should an earthquake occur, however, that risk is not substantially different than other similar sites in the region. The nearest significant active faults are the San Andreas and Cleghorn faults, which are approximately 12.16 and 9.63 miles away from the subject site, respectively. The area in consideration shows no mapped faults on-site according to maps prepared by the California Geologic Survey and published by the International Conference of Building Officials (ICBO). Buildings proposed for the site will be required to be constructed in accordance with the most recent edition of Title 24 of the California Building Code (CBC) and chapter 8.32.050 of the City of Hesperia Municipal Code to provide collapse-resistant design. Therefore, impacts are expected to be **Less Than Significant**.

(Source: City of Hesperia, 2020; A.G.I. Geotechnical Inc, Soils Engineering Investigation, 2020; Department of Conservation Map Server, 2018)

iii) Seismic-related ground shaking?

Liquefaction is a phenomenon where water-saturated granular soil loses shear strength during strong ground shaking produced by earthquakes. The loss of soil strength occurs when cyclic pore water pressure increases below the groundwater surface. Potential hazards due to liquefaction include the loss of bearing strength beneath structures, possibly causing foundation failure and/or significant settlements. The soils encountered within a depth of 41.5 feet at the project site predominately consist of medium dense to very dense silty sands. Groundwater was not encountered in any of the borings drilled at the subject site. In addition, a Liquefaction Hazard Map has not been prepared for the subject site. The project site is not located within a "State of California Liquefaction Seismic Hazard Zone". Through compliance with the 2019 California Building Code and implementation of standard engineering and construction protocols, impacts associated with seismic-related ground failure, including liquefaction, will be reduced; therefore, **No Impacts** would occur.

(Source: City of Hesperia, 2020; A.G.I. Geotechnical Inc, Soils Engineering Investigation, 2020)

iv) Landslides?

The Project site is relatively flat and contains no hillside or steep slopes nor are any hills or slopes in the vicinity. The Project site is located in an area with a low potential for landslides since there are no substantial natural or man-made slopes in the vicinity, and grading associated with the Project is not anticipated to result in the creation of any new

substantial slopes on-site that could be subject to landslide. Grading of the site would not pose a landslide threat to adjacent properties, future site workers, or the proposed buildings. The proposed Project would not create and would not be exposed to any risk of a landslide and **No Impacts** would occur.

(Source: City of Hesperia, 2020; A.G.I. Geotechnical Inc, 2020)

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

The Geotechnical Report determines that there would be no long-term soil erosion as the proposed project would involve the development of structures, paving (i.e., hardscape), and landscape. Short-term construction-related erosion potential would be addressed through compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements, and impacts would be **Less Than Significant with Mitigation Incorporated**.

(Source: City of Hesperia, 2020; A.G.I. Geotechnical Inc, Soils Engineering Investigation, 2020; A.G.I. Geotechnical Inc, Percolation Testing Results, 2020)

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? Seismic-related ground shaking?

The subject site is relatively flat and level and there are no significant slopes proposed as part of the proposed development. The soils encountered within a depth of 41.5 feet at the project site predominately consist of medium dense to very dense silty sands. Groundwater was not encountered in any of the borings drilled at the subject site. Based on the encountered site conditions, liquefaction induced settlement is not considered a significant concern for the subject site. It is recommended that following site clearing, fill removal, and demolition activities, is a minimum. The upper three feet of on-site soils should be cleared of debris and removed then placed back as compacted fill, the removal cleaning, compaction and reintroduction of fill should extend 3 feet beyond the building lines in each direction after the soils have been moisture-conditioned to at least optimum moisture-content, and recompacted to a minimum of 95 percent of the maximum dry density based on ASTM Test Method D1557. In addition, remedial grading should be performed to a minimum of two (2) feet below proposed foundation bearing grades. Within the pavement and exterior flatwork areas, the exposed fill subgrade should be moisture-conditioned to at least optimum moisture-content and recompacted to a minimum of 90 percent of the maximum dry density based on ASTM Test Method D1557. Prior to backfilling, the bottom of the excavation should be proof-rolled and observed by a soil specialist to verify stability. This compaction effort should stabilize the upper soils and locate any unsuitable or pliant areas not found during our field investigation. Implementation of the recommendations in the geotechnical report in regards to the design and construction of the anticipated development will prevent off-site landslides, lateral spreading, liquefaction, or collapse from occurring during construction activities. Therefore, with the recommendations implemented **Less Than Significant Impacts would occur with Mitigation Incorporated**.

(Source: A.G.I. Geotechnical, Inc, Soils Engineering Investigation, 2020)

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial director indirect risks to life or property?

The near-surface sand soils encountered at the site have been identified through laboratory testing as having a very low expansion potential. Expansive soils have the potential to undergo volume change, or shrinkage and swelling, with changes in soil moisture. As expansive soils dry, the soil shrinks; when moisture is reintroduced into the soil, the soil swells.

The preferred materials specified for Engineered Fill are suitable for most applications with the exception of exposure to erosion. Project site winterization and protection of exposed soils during the construction phase should be the sole responsibility of the Contractor since he has complete control of the project site at that time. Imported Non-Expansive Fill should consist of a well-graded, slightly cohesive, fine silty sand or sandy silt soil, with relatively impervious characteristics when compacted. This material should be approved by the Soils Engineer prior to use.

Fill soils should be placed in lifts approximately 6 inches thick, moisture-conditioned to at least optimum moisture-content, and compacted to achieve at least 95 percent of the maximum dry density based on ASTM D1557. Additional lifts should not be placed if the previous lift did not meet the required dry density or if soil conditions are not stable.

It is recommended that no material shall be moved or compacted without the presence of the Soils Engineer. Material from the required site excavation may be utilized for construction site fills provided prior approval is given by the Soils Engineer. All materials utilized for constructing site fills shall be free from vegetation or other deleterious matter as determined by the Soils Engineer. Impacts to life or property due to expansive soils would be **Less Than Significant with Mitigation Incorporated.**

(Source: City of Hesperia 2020; A.G.I. Geotechnical, Inc, Soils Engineering Investigation, 2020)

e) Have soils incapable of adequately supportiug the use of septic tanks or alternative waste-water disposal systems where sewers are not available for the disposal of wastewater?

The Project would not install any septic tanks or alternative waste-water disposal systems. **No** Impact would occur.

(Source: City of Hesperia, 2020; A.G.I. Geotechnical Inc, Soils Engineering Investigation, 2020; A.G.I. Geotechnical Inc, Percolation Testing Results, 2020)

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

Will the Project effect Paleontological Resources?

The Project Site is not known to contain paleontological resources, nor did the Alta Report (Alta 2020) identify any such resources. The Project is expected to have **No Impact** on such resources.

Mitigation Measures

No significant impacts were identified. Mitigation measures have been incorporated into Project Design standards and no additional measures are required.

3.8 GREENHOUSE GAS EMISSIONS

Would the Project?

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

Greenhouse gases (GHGs) are primarily made up of carbon dioxide (CO2), methane (CH4), and nitrous (N2O) oxide and are collectively reported as carbon dioxide equivalents (CO2e). These gases are directly emitted from several sources including natural gas in equipment (water heaters, boilers, process heaters etc.), on-road vehicles and off-road construction equipment burning fuel such as gasoline, diesel, biodiesel, propane or natural gas. Indirect GHG emissions result from electric power used to operate process equipment (power plants), lighting and utilities at a facility. Electric power used to pump the water supply (e.g., wells, pipelines, aqueducts) and disposal and decomposition of landfill waste are also indirect sources of GHG emissions (CARB 2017).

GHGs have not been subject to comprehensive legislation from the U.S. Congress, however, federal policy was pushed forward in the 2007 Supreme Court decision in Massachusetts et al. vs. Environmental Protection Agency (EPA). The Court's ruling held that the GHGs fit the Clean Air Act's (CAA) definition of pollutants and that the agency was responsible for their regulation.

Following Massachusetts vs. EPA, the EPA issued in April 2009 a "Finding of Endangerment" holding that six GHGs pose a threat to human health under the CAA. In October 2009, the agency issued a Final Rule (effective December 29, 2009) requiring annual reporting by major GHG emitters (specific types of entities emitting 25,000 or more metric tons per year) (Federal Register 2009).

The President's Council on Environmental Quality issued Guidance for Federal Greenhouse Gas Accounting and reporting in October of 2010. That Guidance was revised in 2012 (CEQ Revision 1: June 4, 2012). That Guidance required federal agencies to report both direct and indirect emissions of Greenhouse Gases. This project would constitute a very minor and temporary emission of GHGs during construction.

In 2006, California adopted the Global Warming Solutions Act (SB32) into law. This legislation directed the CARB to direct the reduction of GHG emissions to 1990 levels by 2020 and establish regulatory and market mechanisms to achieve this goal. This limit is an aggregated statewide limit and is not sector or facility specific. The 2020 GHG emissions limit is 431 metric tons of carbon dioxide equivalent (MMTCO2e).

Calculations of the original 1990 limit was approved in 2007 and was revised in 2014 using the scientifically updated Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4). The IPCC Board approved 431 MMTCO2e as the 2020 emission limit with the approval of the First Update to the Scoping Plan on May 22, 2014.

In 2016, Senate Bill 32, California Global Warming Solutions Act of 2006: Emissions Limit (SB 32) further requires California to reduce statewide GHG emissions to 40% below the 1990 level by 2030 (CARB 2020).

California's Building Energy Efficiency Standards are updated on an approximately three year cycle. The most recent update was completed in 2019, which improved upon the previous 2016 standards for new construction of, and additions and alterations to, residential, commercial and industrial buildings. These 2019 standards went into effect on January 1, 2020 (CEC 2019).

Since the Title 24 standards require energy conservation features in new construction (e.g., high efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double glazed windows, water conserving plumbing fixtures, etc.), they indirectly regulate and reduce GHG emissions (Yorke 2020).

BlueScape Environmental (2021) has conducted a study of Greenhouse Gas Emissions utilizing CalEEMod modelling. That modelling is summarized in Table 7A and 7B. As indicated, total tons of CO2e per year from the Project (with construction emissions amortized over the 30 year life of the Project) are 2,129 tons per year. The modeling includes modeling of energy use reductions from the proposed 1,500 kw solar farm proposed for the building roof. The modeling shows GHG emissions of about two percent of the MDAQMD Screening Threshold of 100,000 tons per year with these assumptions. Therefore, the modelled Greenhouse Gas emissions are **Less Than Significant with Mitigation Incorporated**. Some of the Mitigation and Control Measures for GHG are listed below:

Mitigation Measures

GHG-1 Greenhouse gases can be reduced during construction by not allowing diesel engines on construction equipment to idle more than 10 minutes at a time. During operation, this applies to large diesel trucks (unloading and loading).

GHG-2 During operations, far less daily trips are anticipated than would be normal for this size of warehouse facility. The applicant indicates that only 30-35 employees and 13-18 trucks per day are anticipated. Modeling for the full use facility has been provided (BlueScape 2021) and emissions are less than GHG thresholds. This modeling also includes offsets for proposed solar power

Based on the modelling, greenhouse gas emissions can be substantially reduced during construction and/or operation, especially for Energy Source and Waste Generation categories through implementation of the Mitigation Measures in CalEEMod. Based upon the size of the project and the modelling conducted, the CEQA determination for greenhouse gas emissions is expected to be **Less than Significant with Mitigation Incorporated.**

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the Project?

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

The Project will be a Warehouse for Pixior, LLC (Pixior) receives, organizes and ships apparel, shoes and accessories for its customers which include major wholesale and retail companies. Since these are non-hazardous materials, no hazardous substances are expected to be manufactured or stored on the Site.

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

It is possible that fuel or other materials (oil, hydraulic fluid etc.) associated with construction vehicles may be spilled on the site during construction. Any such spills should be immediately contained and cleaned up in accordance with local, state and federal regulations and requirements. Best Management Practices (BMPs) should be used on the Site for any necessary temporary storage of fuel, oil or other material related to construction vehicles. Preferably no such materials should be utilized on the site during construction. Any storage of hazardous materials or waste on-site must comply with all Title 22, CCR Regulations. With BMPs used during construction, the Project is expected to result in **Less Than Significant Impact with Mitigation Incorporated**.

Mitigation Measures

HHM-1 Comply with federal and state hazardous materials regulations regarding use, storage and transport of Hazardous Materials used during both construction and operation. Utilize Best Management Practices (BMPs) during Project construction. Conduct any vehicle maintenance or fueling operations off-site during construction and operation.

b) **Create a significant hazard to the public or the environment through reasonably foreseeable accident conditions resulting in the release of hazardous materials into the environment.**

As discussed in subsection a) above, use of BMPs and conformance with State and Federal regulations for any temporary storage or use of hazardous substances on the Site should reduce the risk of spills and reasonably foreseeable accidents with such materials. Any storage of use of materials during construction or operation which may exceed federal and state requirements for temporary storage of Hazardous Materials should be subject to the prior preparation of a Hazardous Materials Management Plan for the Project.
If these requirements are complied with, the Project should result in **Less Than Significant Impact with Mitigation Incorporated**.

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

The Site is more than 0.25 miles from any school. There will be **No Impact** from the Project relating to hazardous materials effects on schools.

d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code§65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

The Project is not known to be on any list of hazardous sites. Therefore, the Project will result in **Less Than Significant Impact** from Hazards or Hazardous Materials.

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?**

The site is more than two miles from any public airport and is not in an airport zone. Therefore, the Project has been rated as **No Impact** with regard to safety hazards including excess noise.

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

It will not interfere with any emergency plan. The Project will result in **No Impact** regarding that issue.

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

The current sparse desert vegetation will be removed from the Site and the Site is protected from fire on the south side by the California Aqueduct. The north side is a paved warehouse site, and the east side is Amargosa Road and the Interstate 15 Freeway. There is no expected risk from wildland fire and the Project will result in **Less Than Significant Impact**.

3.10 HYDROLOGY AND WATER QUALITY

Would the project?

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

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

The Water Quality Management Plan prepared for the Site (DEA 2020a) and the Preliminary Hydrology Report (DEA 2020c) indicate that the proposed Project would result in runoff increase, which will be offset by construction of an underground Contech CMP Infiltration/Retention Basin System. That system is expected to accommodate the increase in runoff and satisfy the WQMP Requirements of the City of Hesperia (DEA 2020c). The Project is expected to be **Less Than Significant with Mitigation Incorporated**.

HYD-1 Implement the Water Quality Management Plan in accordance with the Preliminary Hydrology Report and subsequent detailed engineering calculations and design plans.

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

The Preliminary Hydrology Report and the WQMP (DEA 2020a,c) indicate that site soils are well drained and will adequately infiltrate on-site runoff. The groundwater table is at 41 feet below ground surface. The underground retention system will adequately filter and infiltrate stormwater back to the groundwater system in accordance to design plans. Provided the system works as specified, the Project will result in **Less Than Significant Impacts with Mitigation Incorporated**.

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?

There is currently a low-gradient drainage pattern to the northeast. There is also an underpass channel in the western area which routes local flows past the California Aqueduct. That channel currently discharges to a storm-drain on the adjacent warehouse property to the north.

i) result in a substantial erosion or siltation on- or off-site;

The Hydrology Report (DEA 2020c) specifies channel modifications and a surface retention area to improve flow handling on the western portion of the Site which now contains a runoff channel. The modifications are anticipated to improve runoff conditions and reduce stormwater flows. This should reduce erosion and siltation on and off-site following implementation of the retention system. This will result in impacts which are **Less Than Significant with Mitigation Incorporated**.

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

The Hydrology Report also addresses flooding potential in the western channel (DEA 2020c) and indicates that flows will be slowed and reduced by implementation of the retention system. This will result in flooding impacts which are **Less Than Significant with Mitigation Incorporated.**

Mitigation Measure

HYD-1 Implement all relevant measures identified for the Project in the Preliminary Water Quality Management Plan (DEA 2020b) and the Preliminary Hydrology Report (DEA 2020a). These measures will include erosion control during construction and control of stormwater via appropriate retention facilities following Project construction.

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

The Preliminary Hydrology Report (DEA 2020c) and the Water Quality Management Plan (DEA 2020a) indicate that any stormwater exceeding the capacity of the underground retention system will be discharged at the southeast corner of the property in accordance with requirements of the City of Hesperia. While final reports have not yet been completed, no substantial additional sources of polluted runoff are expected with installation of the underground retention, infiltration and storage system at the Site. Impacts of excess drainage or stormwater are expected to be **Less Than Significant with Mitigation Incorporated**.

iv) impede or redirect flood flows?

Flood flows on the aqueduct underpass will be slowed by a retention pond. Other flows on the Site will be directed into an underground retention and infiltration system designed to slow and retain stormwater. If properly designed, this system should result in impacts from flood flows which are **Less Than Significant with Mitigation Incorporated.**

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

The Project is not expected to generate pollutants. Parking lots will accumulate some hazardous substances (metals from brake linings, leakage of oil etc.). These compounds will be filtered through the underground infiltration system prior to discharge. No significant concentrations of these compounds is expected. The Project is expected to cause impacts which are **Less than Significant**.

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

Hydrology Reports (DEA 2020c) and a Water Quality Management Plan (DEA 2020a) have been developed for the Project. With the implementation of these plants, project effects are expected to be **Less Than Significant**.

3.11 LAND USE AND PLANNING

Would the project?

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect?	☐	☐	☐	☒

a) Physically divide an established community?

The project site consists of approximately 20.8 acres of vacant, undeveloped land that is routinely disturbed and does not contain any structures. The project site does not provide access to established communities and would not isolate any established communities or residences **from** neighboring communities. The project site and the property adjacently north of the project is zoned as commercial/ Industrial business park, and the remaining surrounding area, south, east, and west are zoned as general commercial. Development and operations of the Project would not physically disrupt or divide the arrangement of as established community. **No impact** would occur, and no further analysis of this subject is required.

b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

The project site has a General Plan land use designation of commercial/industrial business park and zoning designation of CIBP. The proposed Project is the construction of a warehouse. The proposed use of the project site would be compatible with the project site's land use and zoning designations. **No impact** would occur.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

The site does contain western Joshua trees (trees (*Yucca brevifolia*). On September 22, 2020, California Department of Fish and Wildlife (CDFW), granted the western Joshua tree (*Yucca* brevifolia) a temporary one-year endangered species protection, until a final decision is made. Therefore, preparation of a Joshua Tree Protection Plan (RCA 2020b)has been prepared for the Site and an Incidental Take Permit or potentially other permits may be required from CDFW.

3.12 MINERAL RESOURCES

Would the project?

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

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

Project will have **No Impact.**

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?

Project will have **No Impact.**

3.13 NOISE

Would the project result in?

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

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 ordinanee, or applicable standards of other agencies?**

The Project will not result in generation of substantial or permanent increase of noise levels in excess of local or state noise standards. Some noise is expected from construction machinery during construction. However, there are no residential receptors near the Site which could be affected by such increases. The adjacent warehouse faces away from the Site and is not expected to be affected. The new warehouse facility will face the back wall of the facility to the north and will thus not impact that site during construction or operation. Therefore, if construction is limited to normal construction hours (daytime period), no other Mitigation Measures should be necessary. The Project will be **Non-Significant with Mitigation Incorporated.**

b) **Generation of excessive ground-borne vibration or ground borne noise levels?**

No pile driving or other ground-vibrating methods are expected to be used during construction. The Project will result in **No Impact**.

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?**

The Project is not within 2.0 miles of any public airport. The Project would not expose people residing in or working in the Project Area to excessive noise levels. The result of Project construction and operation would be **No Impact**.

3.14 POPULATIONS AND HOUSING

Would the project:

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

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

No residential use is included in the Project. Workers are expected to be already working in the area. The Project will have **No Impact**.

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

There are no current facilities or residences on the Site. The Project will have **No Impact**.

3.15 PUBLIC SERVICES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒

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?

The Project will result in a commercial warehouse facility. There will be a slight increase in risk of fire potentially requiring more fire protection from the local Fire Department. However, the building will be fitted with sprinklers as per commercial building codes and will have on hand adequate fire extinguishers as per state code. This should lower the risk to **Less Than Significant Impact**.

Police protection?

The property will be fenced and there will be a guardhouse at the gate. Therefore, the Project will mainly provide its own security. There may be an occasional slight increased need for police protection at the facility. This should result in **Less Than Significant Impact**.

Schools?/Parks?

The Project will not result in additional housing or population, but should add 30-40 jobs, mostly drawn from the local area. Schools will not be impacted, nor will parks (see also Section 3.16 Recreation below). Hospitals and other public services are not expected to be significantly affected. The Project will result in **No Impact** or **Less Than Significant Impact** for schools, hospitals and recreational facilities in the area.

3.16 RECREATION

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) 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?

The project proposes to develop the Project site with commercial-light industrial land uses. The project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. While some informal off-road vehicle use currently occurs on the Site, such use is not approved by the owners and technically constitutes trespassing.

Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, therefore, **No Impact** would occur, and no further analysis of this subject is required.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The proposed Project would not include recreational facilities nor require the construction or expansion of recreational facilities that might have an adverse effect on the environment. **No Impact** would occur.

3.17 TRANSPORTATION

Would the project:

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

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

A Focused Traffic Impact Study has been prepared for the Project (DEA 2021). That study indicates that the Project will generate 1,027 Average Daily Traffic (ADT) trips (PCE or Passenger Car Equivalent) trips. This includes 291 trips by 4 Axel Trucks (at a factor of 3.0 PCE, 72 and 41 trips by 3-Axel and 2-Axel Trucks respectively and 623 daily passenger car trips. The traffic to and from the Project is expected to mainly use the Main Street entrances and exits off of Interstate 15. The Traffic Study indicates that Level of Service will not require mitigation other than compliance with street improvements required by the City. This will result in **Less Than Significant Impacts with Mitigation Incorporated** for LOS Traffic Analysis.

A study of Vehicle Miles Travelled (VMT) has been carried out for the proposed Project (Urban Crossroads 2021, DEA 2021) which has also been incorporated into the updated Traffic Study (DEA 2021). That VMT study indicates that based on a 450,000 square foot facility, an estimated 296 employees would utilize the facility, resulting in 13,291 Vehicle Miles Travelled. This in turn would result in a VMT per Service Population (SP) of 45.37 in 2020 and 47.72 in 2040 with the Project.

Both of these projections exceed the City of Hesperia's VMT/SP guidelines of 32.7 threshold. This would result in a **Potentially Significant and Unavoidable** impact from the Project according to the VMT study (UC 2021). The impact was calculated for local impacts at that level; however, the impact was found to be "Not Significant" at the regional level (San Bernardino County) (UC2021). Mitigation suggested to offset part of the VMT increase are suggested in the discussion in Section 3.17b below. The City of Hesperia will determine whether these impacts can be adequately mitigated to fall below the threshold of significance.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3,subdivision (b)

CEQA Guidelines (15064.3(b)) recommend that transportation impacts be evaluated primarily by road capacity and increases or decreases in vehicle miles travelled due to the Project. This has been evaluated in detail for the Project (DEA 2021 and UC 2021). The revised Focused Traffic Study indicates a probable increase of vehicle miles travelled above the City of Hesperia's threshold. However, there is no significant regional effect and overall shipping miles may be reduced by building this warehouse at this location. The location is expected to increase shipping efficiency for Pixior and hence, likely reduce the vehicle miles travelled for truck traffic shipping the products. The City of Hesperia should determine whether the exceedance of the City's VMT criteria constitute an impact which can be permitted for the Project. It may be possible to develop strategies with the developer which could result in the Project being **Less Than Significant with Mitigation** (see below), however, this must be determined by the City during Project Permitting.

TR-1 The City of Hesperia may require transportation modifications (adding a bus stop near the facility, modification of public transportation routes etc.) to reduce Vehicle Miles Travelled. Ride sharing requirements at the facility would also help in keeping VMT within the City's required limits. This would help keep VMT levels to be **Less Than Significant with Mitigation Incorporated.**

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

The Project lies within a straight section of Amargosa Road, although there is a bend to the south, which avoids the freeway exit ramps. The Traffic study did not find this to be a hindrance to vehicle safety. Thus, there would be **Less Than Significant Impact** from this configuration.

d) Result in inadequate emergency access?

The Project will have two driveways on a straight section of Amargosa Road to access the Project. This is expected to provide adequate emergency access, since the facility is designed to allow access by 4-axel trucks and other large vehicles. There will be **No Impact** to emergency access.

3.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☒	☐	☐
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

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

CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) is listed in a local register of historical resources as defined in PRC §5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC §5024.1(g); or (4) is determined to be a historical resource by a Project's Lead Agency (PRC §21084.1 and State CEQA Guidelines §15064.5[a]). "Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. The project has not been listed or identified as eligible for listing on the California Register or Historic Resources, nor has it been designated on a local register of historic resources.

Intensive field investigations were conducted by Dean Martorana, RPA (Alta Archaeological Consulting, LLC) on March 13, 2020 and no historical resources were identified which would be eligible for listing in the California Register of Historical Resources. With the implementation of Mitigation Measures TCR-1, TCR-2, alongside CUL-1, CUL-2 and CUL-3, the impacts will be considered **Less Than Significant with Mitigation Incorporated.**

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

The provisions of Public Resources Code 21074 were established pursuant to Assembly Bill 52 (AB 52). AB 52 applies to all development projects that have a notice of preparation (NOP), or a notice of negative declaration or a mitigated negative declaration which was filed on or after July 1, 2015. The proposed project is subject to the provisions of AB 52; therefore, the City of Hesperia has sent notifications to all Native American tribes which have traditional or cultural affiliation to the area encompassing the project site. With the implantation of Mitigation Measures TCR-1, TCR-2, alongside CUL-1, CUL-2, and CUL-3 the impacts will be considered to be **Less Than Significant with Mitigation Incorporated.**

Mitigation Measures

CUL-01 In the event that pre-contact cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within Mitigation Measure TCR-1, if any such find occurs and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. This measure shall be implemented to the satisfaction of the City Development Services Department.

CUL-02 If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly. This measure shall be implemented to the satisfaction of the City Development Services Department.

CUL-03 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. This measure shall be implemented to the satisfaction of the City Development Services Department.

TCR-01 The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in Mitigation Measure CUL-1, of any pre-contact resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site. This measure shall be implemented to the satisfaction of the City Development Services Department.

TCR-02 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 and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project. This measure shall be implemented to the satisfaction of the City Development Services Department.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the 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?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Sewer and water services will be provided by the City of Hesperia. Electrical services will be provided by Southern California Edison and by a proposed on-site roof-mounted solar farm consisting of 400,000 square feet of solar panels. Internet services will be provided by a local provider selected by the Project applicant. The Project must comply with requirements of the City of Hesperia in order to obtain permits. Part of the City's review process is to determine the ability of the City to serve the project with water and sewer service.

At this time, there is no indication that limitations exist on City utilities that the Project would cause to be exceeded. The Project will also generate 1,500 kw of electrical power with an on-site solar farm mounted on the roof of the building, thus decreasing its dependence on electrical power generated off-site. The Project is expected to have **Less Than Significant Impact** on utilities for items a-e under this issue.

3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

The Project will not impair any adopted emergency response or evacuation plans. The Project will not result in any significant risk associated with wildland fires. The Site and adjacent parcel to the south are vegetated with sparse desert scrub. Most of that vegetation will be removed during site development. The adjacent site is only a few acres in size and is bounded by the California Aqueduct. Thus, there is very low risk of wildland fire following development.

The Project will result in **Less Than Significant Impact** to potential for wildland fires and may in fact slightly reduce that risk for items "a-c". The Project will reduce chances of downstream flooding and there is no risk of landslide, resulting in **No Impact** for item "d".

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The Project will eliminate the present sparse desert scrub vegetation and habitat from the Site, replacing a small percentage of that vegetation with landscaping in narrow strips along the building perimeter (see Figure 5). The Project will also eliminate over 90 percent of the Joshua Trees presently on the Site. The Project will transplant a portion of those Joshua Trees.

California Department of Fish and Wildlife will require an Incidental Take Permit for those trees which cannot be transplanted, since the Joshua Tree is presently a Candidate Species for Threatened (State) status under the Endangered Species Act.

The site, with present design may be found to be **Less Than Significant with Mitigation Incorporated**, with mitigation which includes a Joshua Tree Protection Plan and an Incidental Take Permit acceptable to the City and to State Agencies. Otherwise, this impact could be **Potentially Significant**. If this finding is reached by the City and CDFW, the impacts could be further reduced, potentially to **Less Than Significant with Mitigation Incorporated** through use of the Reduced Density Alternative.

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.)**

The Project is likely to create minor Cumulative Impacts in conjunction with further developments on Amargosa Road, which is zoned for commercial development. This could cause cumulative effects on traffic, air quality, greenhouse gases, and other factors which are area-wide in effect. Cumulative effects on Biological Resources may also be affected, particularly Joshua Trees which have been recently listed as a Candidate Species by the State of California. The effects of the present project are likely to be **Less Than Significant with Mitigation Incorporated**, however, as the City of Hesperia continues to develop Projects along this corridor, it may be necessary to set aside additional areas for open space to keep these issues from becoming potentially significant.

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

The Project is generally expected to have beneficial effects on the area. It will produce a relatively small number of jobs (about 30-35) for the existing population. If may result in efficiencies with deliveries by Pixior and hence an overall reduction or moderate increase in vehicle miles travelled, thus controlling or potentially reducing air pollution and greenhouse gases (although no detailed areawide analysis has been done to date to determine this). It will also reduce biological habitat on almost 21 acres of high desert. If such habitat reduction becomes cumulatively significant as the City of Hesperia develops, this could potentially cause adverse long-term effects on the biota, and potentially on air quality and climate. For this Project, the effect is expected to be **Less Than Significant with Mitigation Incorporated**.

4.0 CONCLUSIONS AND RECOMMENDED MITIGATION

4.1 FINDINGS AND CONCLUSIONS

This Initial Study Report indicates that without mitigation, there is a potential for significant environmental impacts of the Project, mainly in the areas of biological resources, and potential impacts to Traffic (Vehicle Miles Travelled) and to a lesser extent hydrologic impacts during significant stormwater events.

Additional detailed design should be carried out for stormwater management and added to the Site Plan. Additional technical reports should also be prepared for certain biological species including an Incidental Take Permit for Joshua Trees and a pre-construction survey for burrowing owls. The Project will implement and monitor Mitigation Measures and prepare a Mitigation Monitoring Program to mitigate any potentially significant environmental impacts.

This Initial Study document can be conditioned on these reports (likely using the CUP Process) to constitute a Mitigated Negative Declaration to mitigate the potential impacts on Biology and Traffic (VMT). Also, California Department of Fish and Wildlife will need to approve an Incidental Take Permit for Joshua Trees on the Site to reduce impacts to Biological Resources. CDFW must also be consulted in the event that the pre-construction Burrowing Owl Survey indicates the presence of these animals.

4.2 RECOMMENDED MITIGATION MEASURES

Detailed Mitigation Measures can be developed for potential impacts by the City as lead agency under CEQA. The City may at its discretion require additional technical reports to determine those impacts. A Mitigation Monitoring Plan should also be put in place by the City of Hesperia and agreed to by the Applicant.

The City of Hesperia may grant a Conditioned Mitigated Negative Declaration under CEQA as described above. With these conditions the Initial Study is expected to be acceptable to other local, federal and state regulatory agencies (including CDFW).

4.3 MITIGATION MONITORING PLAN

The recommended general mitigation measures discussed above should form the basis of a Mitigation Monitoring Plan, along with the detailed mitigation measures identified in the technical reports listed in Section 3.2, upon their completion.

5.0 REFERENCES

A.G.I. Geotechnical, Inc. 2020a. Soils Engineering Investigation, Proposed Warehouse Distribution Center – APN 0405-062-51, Amargosa Road & live Oak Lane, Hesperia, California. Van Nuys, California.

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6.0 CONTACTS AND PREPARERS

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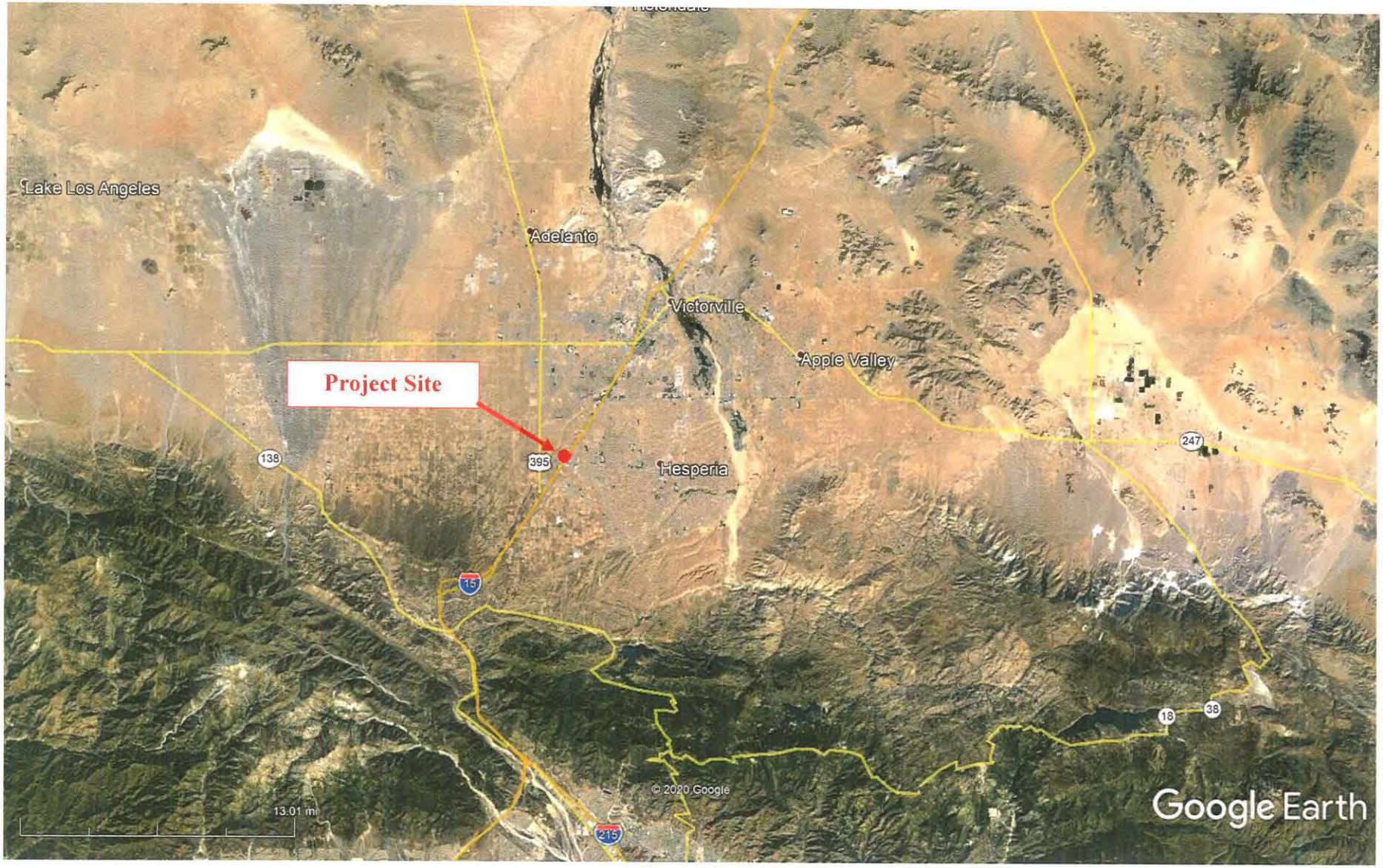


Figure 1. Location Map

RCA Associates LLC 2020

Source: Google Earth 2020

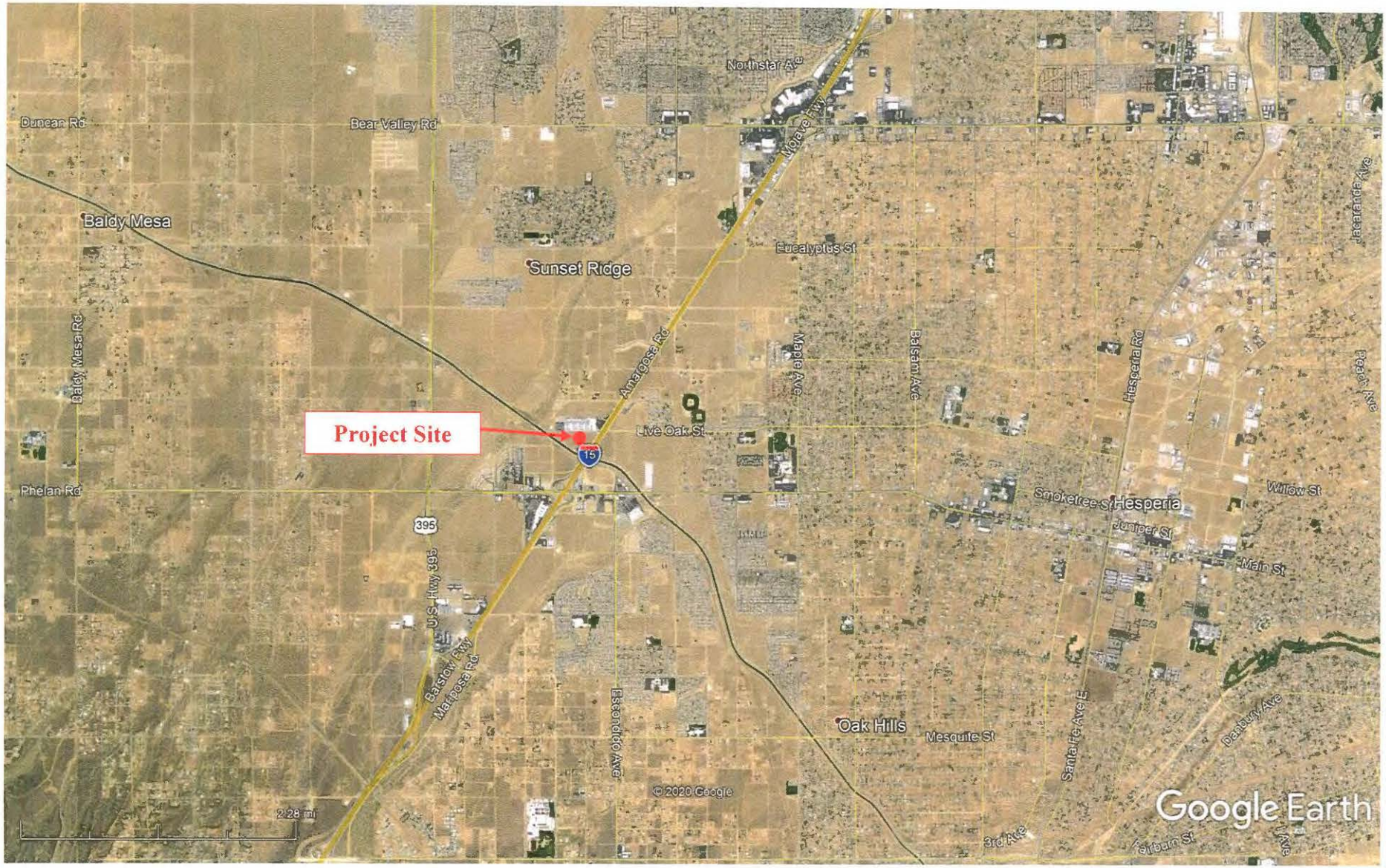


Figure 2. Vicinity Map

RCA Associates LLC 2020

Source: Google Earth 2020

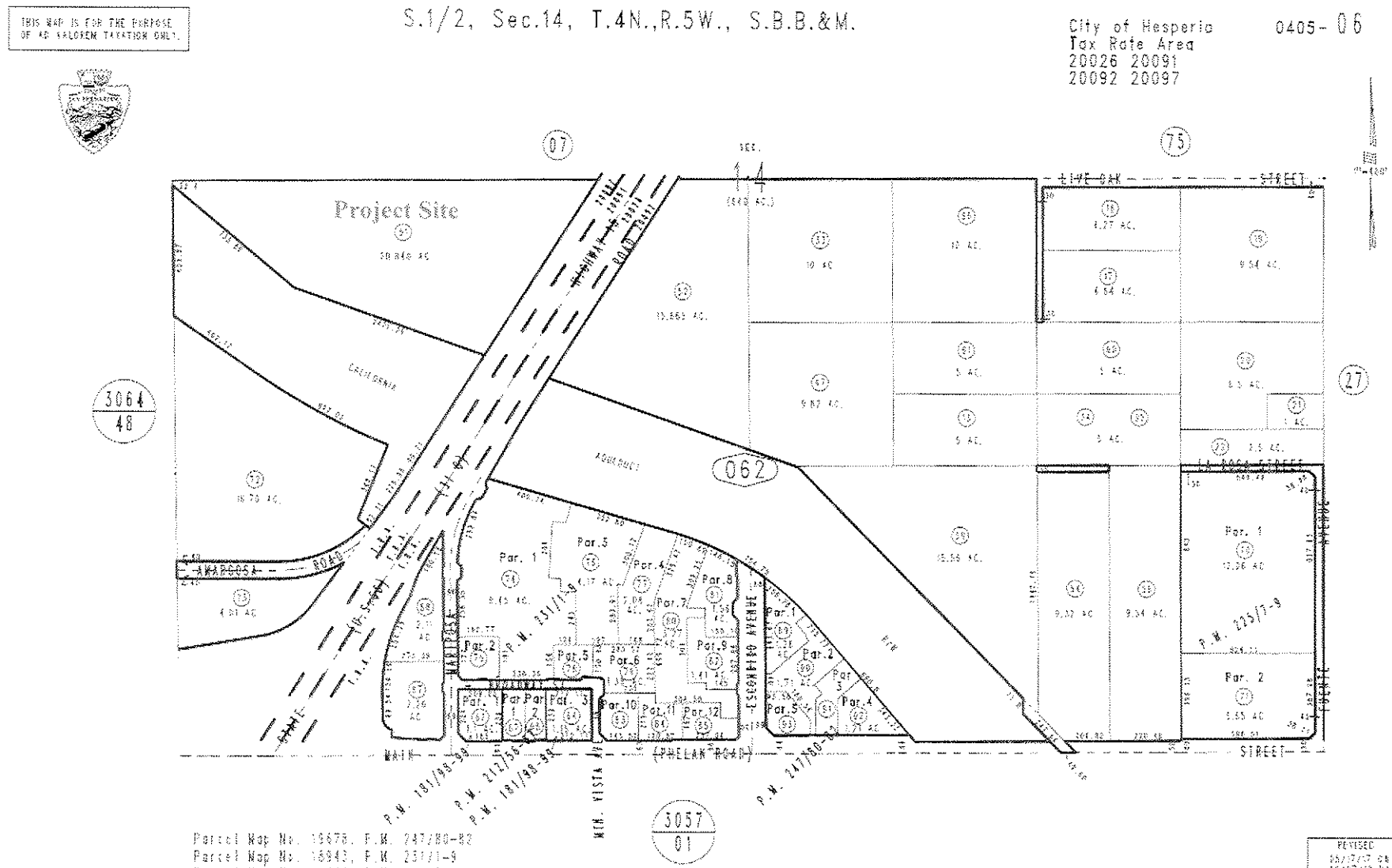


Figure 3. Parcel Map (Amargosa/Pixior Site)

RCA Associates LLC 2020

Source: San Bernardino County 2020

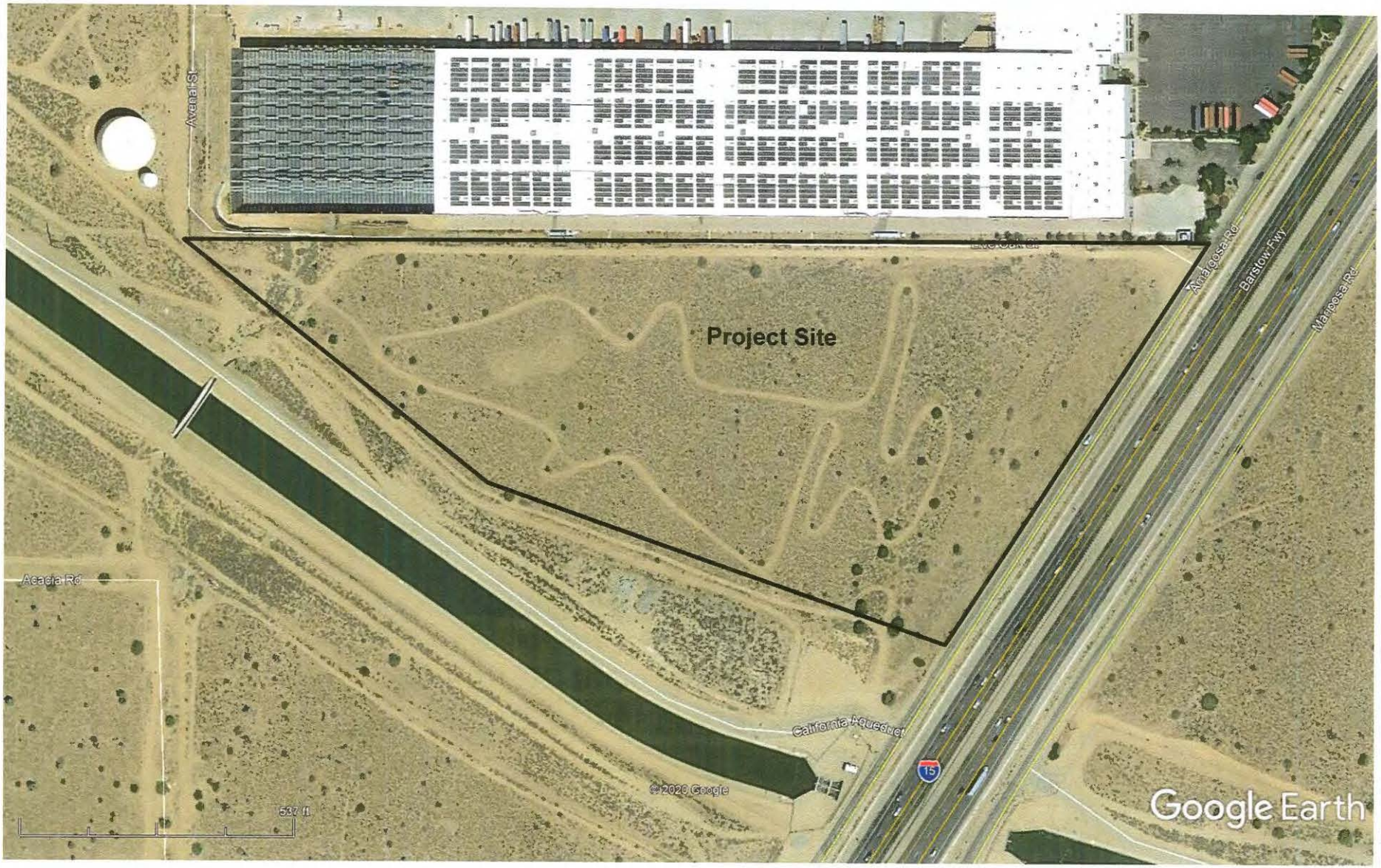


Figure 4. Site Map (Amargosa/Pixior Site)

RCA Associates LLC 2020

Source: Google Earth 2020

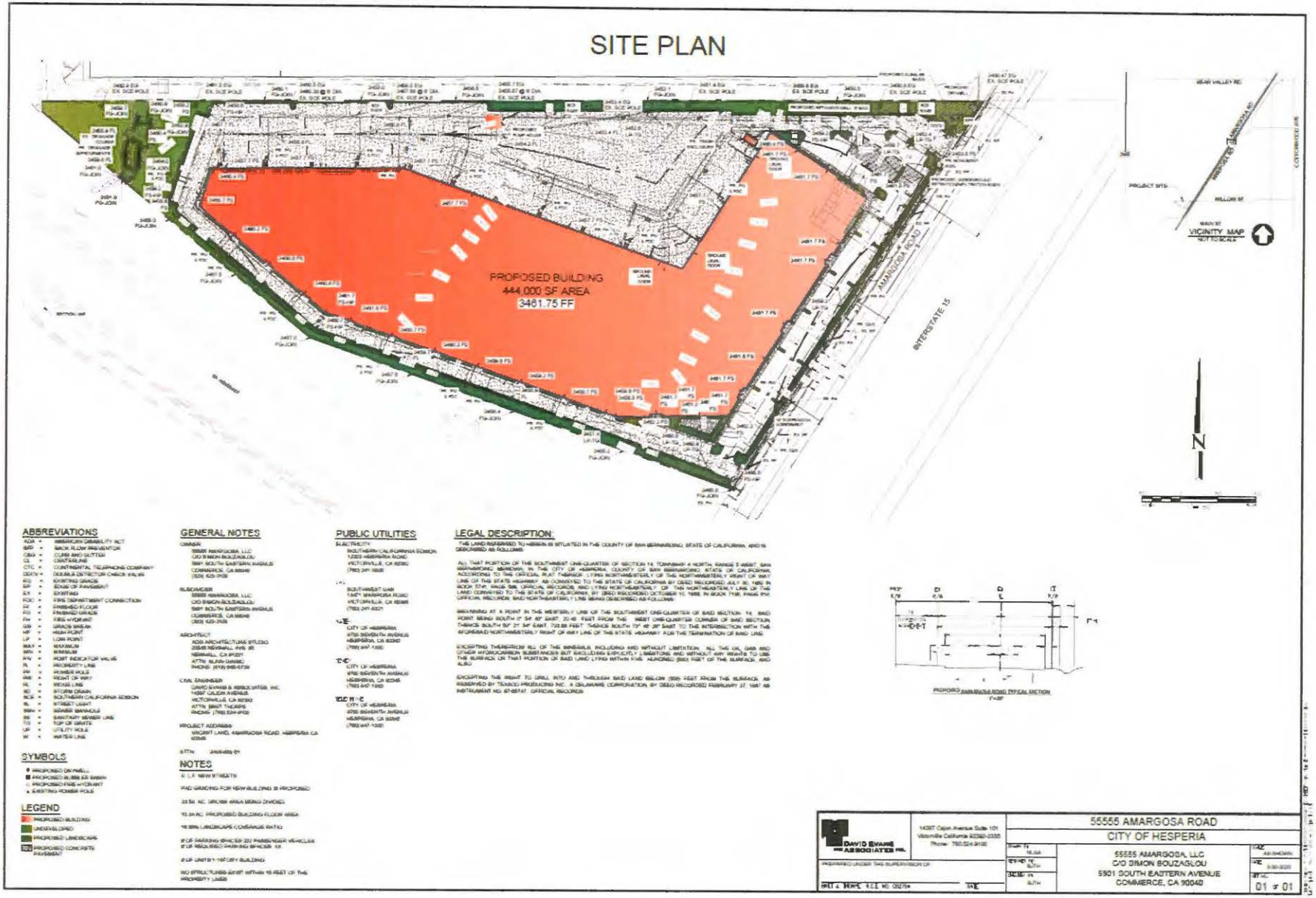


Figure 5. Project Site Map (Amargosa/Pixior Site)

RCA Associates LLC 2021

Source: David Evans and Associates, Inc. 2020

TABLE 1. ENVIRONMENTAL CHECKLIST - SUMMARY OF ISSUES POTENTIALLY AFFECTED BY THE PROJECT

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

TABLE 2. MOJAVE DESERT AQMD ATTAINMENT STATUS

Mojave Desert AQMD Attainment Status					
Pollutant	Averaging Time	California Standards		Federal Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	Non-attainment*
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)	
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m^3	Non-attainment	150 µg/m^3	Non-attainment***
	Annual Arithmetic Mean	20 µg/m^3		-	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	No State Standard		35 µg/m^3	Unclassified/ Attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment*	12 µg/m^3	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Unclassified/ Attainment
	1 Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppb (57 µg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Unclassified/ Attainment
	1 Hour	0.18 ppm (330 µg/m^3)		100 ppm (196 µg/m^3)	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	-	Attainment	0.030 ppm (80 µg/m^3)	Unclassified/ Attainment
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	
	3 Hour	-		0.5 ppm (1300 µg/m^3)	
	1 Hour	0.25 ppm (655 µg/m^3)		75 ppb (196 µg/m^3)	
Lead (Pb)	30 Day Average	1.5 µg/m^3	Attainment	-	Unclassified/ Attainment
	Calendar Quarter	-		1.5 µg/m^3	
	Rolling 3-Month Average	-		0.15 µg/m^3	
Visibility Reducing Particles	8 Hour	Extinction Coefficient of 0.24 per kilometer - visibility of ten miles or more due to particles when relative humidity is less than 70 percent	Unclassified	No Federal Standards	
Sulfates	24 Hour	25 µg/m^3	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Non-attainment**		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)	Unclassified		

*Southwest corner of desert portion of San Bernardino County only

**Searles Valley (northwest corner of San Bernardino County) only

***San Bernardino County portion only

TABLE 3. AMBIENT AIR QUALITY STANDARDS

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12.0 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m³)		9 ppm (10 mg/m³)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)		0.053 ppm (100 µg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 ppb (196 µg/m³)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m³)	
	24 Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas)[11]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[11]	—	
Lead[12,13]	30 Day Average	1.5 µg/m³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m³ (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m³		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

See footnotes on next page ...

Table 4. MDAQMD CEQA Thresholds of Significance

Pollutant	Daily Threshold
	Lbs./day
ROG (VOC)	137
NO_X	137
CO	548
SO_X	137
PM_{10}	82
$PM_{2.5}$	65
H_2S	54
Pb	3
Greenhouse Gases	10,000 MT/yr. CO_2e for industrial facilities
	3,000 MT/yr. CO_2e for land use projects (draft proposal)

Sources: MDAQMD 2020

TABLE 5A. MAXIMUM DAILY CONSTRUCTION EMISSIONS WITH CONTROL MEASURES

	Maximum Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO2**	**PM10**	**PM2.5**
Summer Daily Maximum	71.7	55.9	31.6	0.097	11.6	6.77
Winter Daily Maximum	71.7	55.8	31.4	0.095	11.6	6.77
Significance Thresholds	*137*	*137*	*548*	*137*	*82*	*65*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

See *Appendix (BlueScape 2021) for CalEEMod ver. 2016.3.2 computer model output for construction emissions, daily emissions shown.*

TABLE 5B. MAXIMUM ANNUAL CONSTRUCTION EMISSIONS WITH CONTROL MEASURES

	Maximum Emissions (tons/year)					
	VOC	**NOx**	**CO**	**SO2**	**PM10**	**PM2.5**
Annual Maximum	1.16	1.81	1.03	0.003	0.267	0.159
Significance Thresholds	*25*	*25*	*100*	*25*	*15*	*12*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

See *Appendix (BlueScape 2021) for CalEEMod ver. 2016.3.2 computer model output for construction emissions, annual emissions.*

TABLE 6A. MAXIMUM DAILY OPERATIONAL EMISSIONS WITH CONTROL MEASURES

	Estimated Emissions (lbs/day)					
	ROG	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Proposed Project						
Area	9.42	0.001	0.072	<0.001	<0.001	<0.001
Energy	0.019	0.175	0.147	0.001	0.013	0.013
Mobile	1.24	14.3	13.0	0.085	4.98	1.37
Maximum Daily	**10.7**	**14.5**	**13.2**	**0.086**	**5.00**	**1.38**
MDAQMD Thresholds	*137*	*137*	*548*	*137*	*82*	*65*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

See Appendix (BlueScape 2021) for CalEEMod ver. 2016.3.2 computer model output. Summer emissions shown as they are slightly higher than Winter emissions. Project conditions are defined as mitigated emissions in CalEEMod.

TABLE 6B. MAXIMUM ANNUAL OPERATIONAL EMISSIONS WITH CONTROL MEASURES

	Estimated Emissions (tons/year)					
	ROG	**NOx**	**CO**	**SO2**	**PM10**	**PM2.5**
Proposed Project						
Area	1.72	<0.001	0.006	<0.001	<0.001	<0.001
Energy	0.004	0.032	0.027	<0.001	0.002	0.002
Mobile	0.187	2.62	2.14	0.015	0.891	0.245
Maximum Annual	**1.91**	**2.65**	**2.18**	**0.015**	**0.894**	**0.248**
MDAQMD Thresholds	*25*	*25*	*100*	*25*	*15*	*12*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

See Appendix (BlueScape 2021) for CalEEMod ver. 2016.3.2 computer model output. Project conditions are defined as issions in CalEEMod.

TABLE 7A. PROJECT GHG EMISSIONS SUMMARY
PRIOR TO CONTROL MEASURES (Source: BlueScape 2021)

	GHG Emissions (MT/year)			
	CO2	**CH4**	**N2O**	**CO2e**
Amortized Construction Emissions	18.2	0.003	0	18.3
Area Source	0.014	<0.001	0	0.015
Energy Source	436	0.017	0.004	438
Mobile Source	1,368	0.071	0	1,370
Waste Generation	84.7	5.00	0	210
Water Usage	461	3.33	0.082	569
Total MTCO2e	2,605			
Total tons CO2e	2,872			
Significance Threshold (tons/year)	100,000			

TABLE 7B. PROJECT GHG EMISSIONS SUMMARY
AFTER CONTROL MEASURES

	GHG Emissions (MT/year)			
	CO2	**CH4**	**N2O**	**CO2e**
Amortized Construction Emissions	18.2	0.003	0	18.3
Area Source	0.012	<0.001	0	0.013
Energy Source	34.8	<0.001	<0.001	35.0
Mobile SourcE	1,368	0.071	0	1,370
Waste Generation	21.2	1.25	0	52.5
Water Usage	369	2.67	0.066	455
Total MTCO2e	1,931			
Total tons CO2e	2,129			
Significance Threshold (tons/year)	100,000			

APPENDIX A

SITE PHOTOGRAPHS

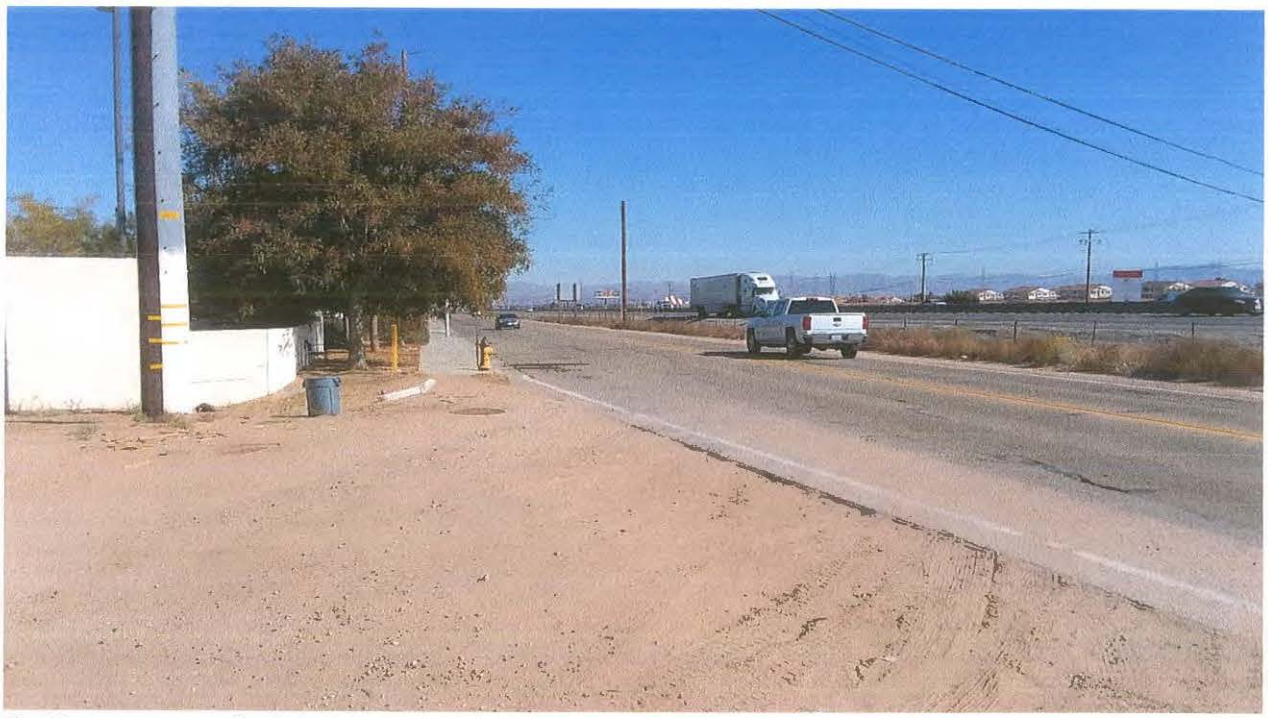
1) Project Site looking northward across Site with large warehouse to the north.

2) Looking east across the Site.

3) Central portion of property showing desert scrub and Johua Trees.

4) Current undefined drainage channel showing underflow crossing of California Viaduct in background.

5) Eastern portion of property looking northeast.



6) Eastern area of property along Amargosa Road.