# California Environmental Quality Act (CEQA)

## Initial Study/Mitigated Negative Declaration

## Tentative Tract Map No.20398

**Lead Agency**

City of Adelanto
Development Services – Planning Division
11600 Air Expressway
Adelanto, CA 92301

**Applicant:**

TKP Family Limited Partnership
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**Prepared By**

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**December 13, 2021**

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# 1.0 Background Information

**1. Project Title:** Tentative Tract Map (TTM) No. 20398.

**2. Lead Agency Name, Address, and Telephone Number:** Development Services-Planning Division, 11600 Air Expressway, Adelanto, CA 92301.

**3. Description of Project:** Subdivide approximately 25.1 acres into 89 - single family residential lots with a minimum lot size of 7,200 square feet. Lot sizes rand from 7,202 square feet to 12,646 square feet with an average lot size of 7,656 square feet. (See Section 3.0, *Project Description,* for additional details).

**4. Project Location:** The Project site is located on the north side of Seneca Road, approximately 660 feet west of Aster Road. The Project site is also identified by the following Assessor Parcel Numbers: 3132-08-04 ,05, 06, and 09.

**5. General Plan and Zoning Designation:** Single Family Residential (R-1). Maximum density allowed is 4 du/ac. The proposed density is 3.4 du/ac.

**6. Other public agency whose approval is required:** Recordation of a final map, issuance of a building permits and completion of structures to current building code is required by the City prior to establishment of the subdivision. Additionally, approvals from the following agencies are required:

- ☐ Lahontan Regional Water Quality Control Board.
- □ California Department of Fish & Wildlife .

**7. Native American Tribal Consultation:** The City commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to Public Resources Code section 21080.3.1. The Project site is located within Serrano ancestral territory and, therefore, is of interest to the San Manuel Band of Mission Indians (SMBMI). As a result, Mitigation Measures TCR-1 through TCR-5 are made a part of the project/permit/plan conditions.

## SIGNIFICANT OR POTENTIALLY SIGNIFICANT ENVIRONMENTAL FACTORS

The following environmental factors have been evaluated in this Initial Study to determine if development of the Project will result in a Significant or Potentially Significant impact(s) to the environment that cannot be mitigated to a level of insignificance, thus requiring that an Environmental Impact Report (EIR) be prepared.

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

**Because none of the environmental factors above have been identified as resulting in a Significant or Potentially Significant Impact (s), adoption of a Mitigated Negative Declaration is recommended.**

# DETERMINATION

Based on this initial evaluation:

| | |
|---|---|
| I find that the proposed use COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be recommended for adoption. | ☐ |
| I find that although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project Applicant. A **MITIGATED NEGATIVE DECLARATION** will be recommended for adoption. | X |
| I find that the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. | ☐ |
| I find that the proposal MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. | ☐ |
| I find that although the proposed Project could have a significant effect on the environment, because all potgentially significnat effect (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to all applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures are are imposed upon the proposed Project, nothing further is required. | ☐ |

| | |
|---|---|
| | City of Adelanto |
| **Signature** | **Lead Agency** |
| James Hirsch, Contract Planner | |
| **Printed Name/Title** | **Date** |

# 2.0-Introduction

## 2.1-Purpose of the Initial Study/Mitigated Negative Declaration

An Initial Study is a preliminary analysis to determine whether a Negative Declaration (ND), Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR) is required for a Project. Based on the Initial Study prepared for the Project, it is recommended that a Mitigated Negative Declaration be adopted. A Mitigated Negative Declaration is a statement by the City of Adelanto that the Initial Study has identified that no significant or potentially significant impacts on the environment with incorporation of the mitigation measures identified in this Initial Study and summarized in Table 2.1, *Summary of Environmental Impacts Requiring Mitigation* below.

## 2.2- Environmental Impacts Requiring Mitigation

Table 2-1 identifies the environmental impacts that require mitigation. All other topics either have "No Impact" or a "Less than Significant Impact" as identified throughout this Initial Study.

**Table 2.1 Summary of Environmental Impacts Requiring Mitigation**

| Environmental Topic Section | Description of Impact | Mitigation Measure |
|---|---|---|
| 4.4 (b) Biological Resources | Biological resources maybe impacted by ground disturbing activities. | BIO-1. Burrowing Owl Pre-Construction Survey, BIO-2. Burrowing Owl Avoidance/Relocation, BIO-3. Mojave Ground Squirrel Pre-Construction Survey, BIO-4. Desert Tortoise Pre-Construction Survey, BIO-5. Nesting Bird Pre-Construction Survey, and BIO-6. Compensatory Mitigation for Jurisdictional Waters. |
| 4.5 (b) Cultural Resources | Sub-surface archaeological resources may be encountered during ground disturbance/. | **CR-1**: Stop work and resource to be evaluated by an archaeologist.<br>**CR-2:** If resource significant, an archaeological treatment plan is required. |
| 4.7 (f) Geology and Soils | Sub-surface paleontological resources may be encountered during ground disturbance. | **GEO-1**: Stop work and resource to be evaluated by a paleontologist.<br>**GEO-2:** If resource significant, a paleontological treatment plan is required. |

| Environmental Topic Section | Description of Impact | Mitigation Measure |
|---|---|---|
| 4.18 (b) Tribal Cultural Resources | Sub-surface tribal cultural resources may be encountered during ground disturbance. | **TCR-1 through TCR-5** requires monitoring during ground disturbance and a treatment plan if significant resources are found. |
| 4.19 (a) Utilities and Service Systems | Undergrounding of utilities and service systems may impact Biological Resources, Cultural Resources, Paleontological Resources, and Tribal Cultural Resources. | Mitigation Measures BIO-1 through BIO-6, CR-1, CR-2, GEO-1, GEO-2and TCR 1 through TCR-6 are required. |

# 3.0-Project Description/Environmental Setting

## 3.1 – Project Location

The Project site consists of 25.1 gross acres located on the north side of Seneca Road, approximately 660 feet west of Aster Road. The Project site is identified by the following Assessor Parcel Numbers: 3132-081-04,05, 06, and 09. (See Figure 3.1- *Location Map and Aerial Photo*).

## 3.2 -Project Description

The Project proposes a tentative tract map to subdivide 25.1 gross acres into 89 lots for single-family detached residential development with a minimum lot size of 7,200 square feet. Lots range in size from 7,202 square feet to 12,646 square feet. The average lot size is 7,656 square feet. There is also a lettered lot for the proposed storm drain basin, a lettered lot for an easement for a future storm drain channel, and a lettered lot for an existing drainage swale.

## 3.3-Proposed Improvements

### *Street Improvements and Access*

Seneca Road

The north side of Seneca Road between Stevens Road and the eastern Project boundary will be improved with pavement, curb, gutter, sidewalk, and a landscaped parkway within a 50-foot, half-width right-of-way. These improvements will match the improvements currently under construction on the south side of Seneca Road.

The north side of Seneca Road between Stevens Road and the western Project boundary will be improved with pavement, curb, gutter, sidewalk, and a landscaped parkway within a 50-foot, half-width right-of-way. There currently no roadway improvements under construction along the

south side of this segment. However, TTM 20401 was recently approved by the City and the south side of Seneca Road will be improved when TTM 20401 develops.

Internal Streets

Proposed internal streets will be public roads improved with pavement, curb, gutter, sidewalk, driveway approaches, and landscaped parkway within a 60-foot, full-width right-of-way.

***Water and Sewer Improvements***

Water Service

The Project will connect to the existing waterline located in Seneca Road adjacent to the Project site.

Sewer Service

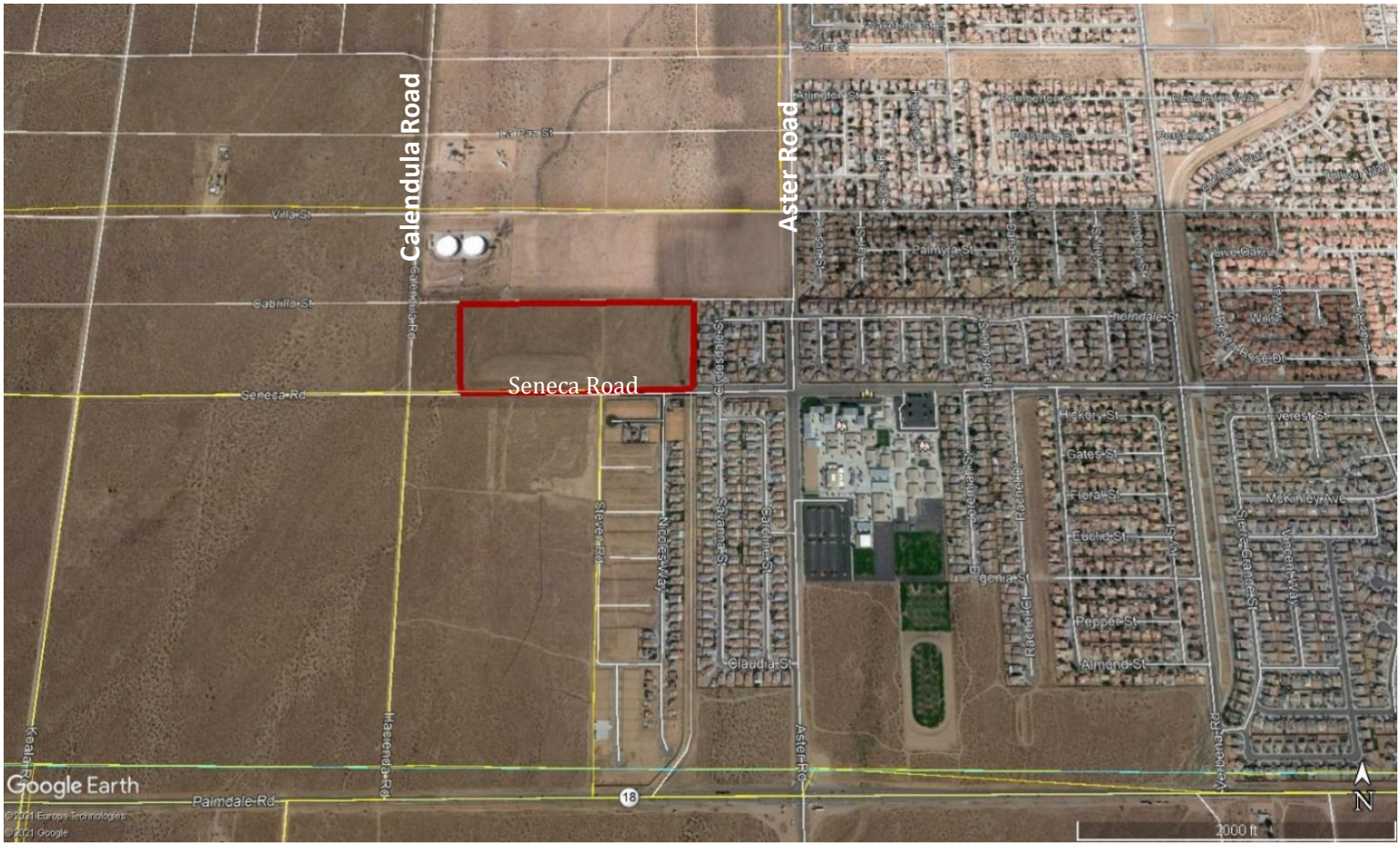
The Project will connect to the existing sewer line located in Seneca Road adjacent to the Project site.

***Storm Drainage Improvements***

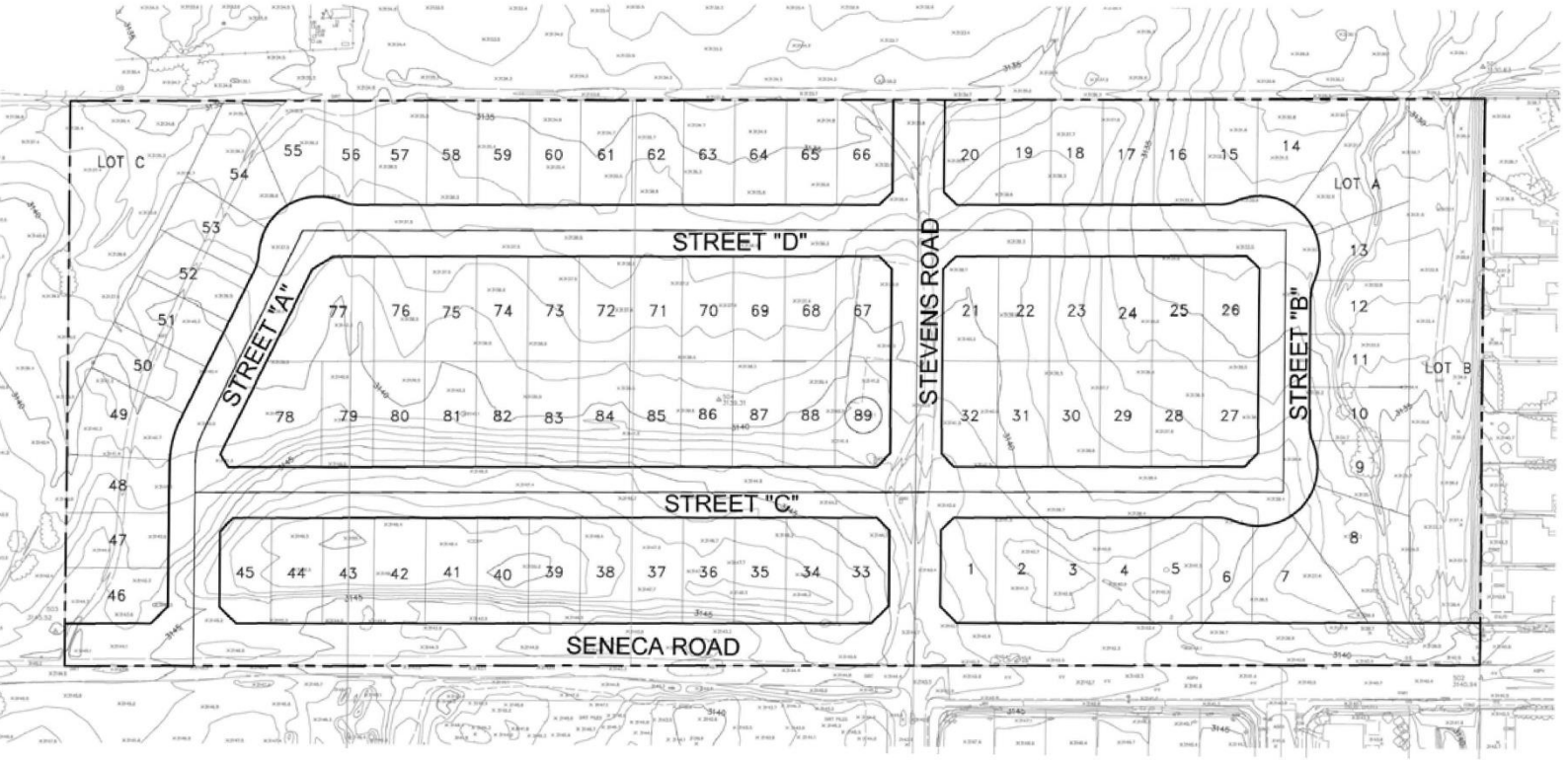
Post development runoff will be conveyed by the internal street system and then routed through the proposed basin located in the northeast corner of the site. The basin is designed with a sufficient size to handle water quality through infiltration, and flood mitigation through retention.

**<Figure 3.1- Location Map/Aerial Photo is on the next page>**

# Figure 3.1- Location Map/Aerial Photo



## Figure 3.2- Tentative Tract Map



## 3.4- Construction and Operational Characteristics

### *Construction Schedule*

Houses will be constructed based on market demand and absorption. Construction of the Project is assumed to begin in the year 2022 and last approximately 21 months. Construction phases are assumed to consist of site preparation, grading, building construction, paving and architectural coating.

### *Operational Characteristics*

The proposed Project would be operated as a residential community. As such, typical operational characteristics include residents and visitors traveling to and from the site, leisure and maintenance activities occurring on individual residential lots and in the on-site recreational facilities and general maintenance of common areas. Low levels of noise and a moderate level of artificial exterior lighting typical of a residential community is expected.

## 3.5-Environmental Setting

Onsite and adjacent land uses, General Plan land use designations, and zoning classifications are shown in Table 3.1.

**Table 3.1: Land Uses, General Plan Land Use Designations, and Zoning Classifications**

| Location | Current Land Use | General Plan Land Use/Zoning Designations |
|---|---|---|
| Site | Vacant undeveloped land | Single Family Residential (R-1) and Public Utilities (PU) |
| North | Vacant undeveloped land | Single Family Residential (R-1) |
| South | Seneca Road followed by vacant undeveloped land and single-family homes | Single Family Residential (R-1) |
| East | Single family homes | Single Family Residential (R-1) |
| West | Vacant undeveloped land followed by Calendula Road | Single Family Residential (R-1) |

*Source: Field inspection, City of Adelanto -General Plan Land Use & Zoning District Map, Google Earth Pro.*

# 4.0-Environmental Analysis

The Project is evaluated based on its potential effect on twenty-one (21) environmental topics. Each of the above environmental topics are analyzed by responding to a series of questions pertaining to the impact of the Project on the particular topic. Based on the results of the Impact Analysis, the effects of the Project are then placed in one of the following four categories, which are each followed by a summary to substantiate the factual reasons why the impact was placed in a certain category.

| Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|
| Significant or Potentially significant impact(s) have been identified or anticipated that cannot be mitigated to a level of insignificance. An Environmental Impact Report must therefore be prepared. | Potentially significant impact(s) have been identified or anticipated, but mitigation is possible to reduce impact(s) to a less than significant category. Mitigation measures must then be identified. | No "significant" impact(s) identified or anticipated. Therefore, no mitigation is necessary. | No impact(s) identified or anticipated. Therefore, no mitigation is necessary. |

# 4.1 Aesthetics

| Threshold 4.1 (a). Would the Project (Except as | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Have a substantial adverse effect on a scenic vista? | | | ■ | |

## Impact Analysis

A scenic vista is defined as a publicly accessible vantage point that provides expansive views of a highly valued landscape. The City of General Plan identifies scenic vistas within the City[1]. Landforms or features that constitute a scenic vista in Adelanto include the Shadow Hills, located approximately nine (9) miles to the north of the Project site and the Mojave River, located approximately eight (8) miles east of the Project site.

Impacts to scenic vistas are analyzed from points or corridors that are accessible to the public and that provide a view of a scenic vista. Potential public views and vantage points from the

[1] City of Adelanto General Plan, Chapter 7, Conservation and Open Space Element.

Project site to the Shadow Hills and Mojave River would be from the public-rights- of way of Seneca Street, Calendula Road, and the internal public streets serving the Project.

Structures within a viewer's line of sight of a scenic vistas may interfere with a public view of a scenic vista, either by physically blocking or screening the scenic vista from view, or by impeding or blocking access to a formerly available viewing position. Those viewers may see the scenic areas prior to development; but would have those views blocked post development. Because of distance to these scenic resources and intervening development, public views of these scenic vistas would not be blocked by the Project.

In addition, as required by Adelanto Zoning Ordinance §17.30.030, Table 20-1, the residential structures proposed of the property are restricted to thirty-five (35), the maximum lot coverage is 40%, and there are required building setbacks for the front, rear, and side lot lines which will serve to create space between structures. As such, the proposed structures would not block or completely obstruct views from surrounding public vantage points (i.e., Seneca Road, Calendula Road, and the internal streets) to the Shadow Hills. The Mojave River in not visible from the Project Site as it is located approximately eight (8) miles east. Impacts are less than significant, and no mitigation measures are required.

***Level of Significance:*** **Less than significant.**

| Threshold 4.1 (b). Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | | | | ■ |

## Impact Analysis

According to the California Department of Transportation, the Project site is not located within a State scenic highway[2]. As such, there is no impact.

***Level of Significance:*** **No impact.**

[2]California Department of Transportation, State Scenic Highway Program, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed April 5, 2021.

| Threshold 4.1 (c). Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| If located in an Urbanized Area, conflict with applicable zoning and other regulations governing scenic quality? | | | ■ | |

## Impact Analysis

According to US Census Bureau, Adelanto is located within the Victorville-Hesperia, CA Urbanized Area[3]. As such, the Project subject to the City's applicable regulations governing scenic quality.[4]

The Community Design Element of the General Plan sets forth the characteristics that should be incorporated into the design of single family detached residential housing units in the R1,R1-.5, R3-8, and DL Zones.[5] General Plan Section H.2, *Design Regulation and Review*, requires development plans (which include architectural design, site plans, and landscaping) be reviewed and evaluated to determine compliance with the objectives and specific requirements of the General Plan *Community Design Element* and Title 17, *Adelanto Zoning Ordinance*.

As required by §17.15.040, *Single-Family Residential Design Standards* of the Zoning Ordinance, construction of the proposed single family detached residential housing units are required to demonstrate compliance with the following salient regulations governing scenic quality:

- Site Character - Existing natural amenities (views, mature trees, and/or topographic features) and other amenities (structures of architectural significance and cultural resources) unique to the site shall be preserved and incorporated into the project's design whenever possible.

- Variation of Development Patterns - Variation of development patterns shall be incorporated in new subdivisions to achieve visual diversity and avoid a monotonous appearance

- Landscaping- A residential subdivision's landscaping shall be used to frame, soften, and embellish the quality of the residential environment, to buffer units from noise or undesirable views,

[3] United States Census Bureau, 2010 Census Urban Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua90541_victorville--hesperia_ca/DC10UA90541_001.pdf accessed April 2021.

[4] City of Adelanto General Plan, page XI-4.

[5] City of Adelanto General Plan, page XI-12-13.

- □ Walls/Fences - Walls shall be designed to complement the architectural design of the homes within the neighborhood.

- □ Architectural Standards-Residential structures should consider compatibility with surrounding character, including building style, form, size, color, material, and roof line.

Mandatory compliance with the above-described provisions of the General Plan and Zoning Ordinance ensures that the Project will not conflict with regulations governing scenic quality.

***Level of Significance:*** **Less than significant.**

| Threshold 4.1 (d). Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | | | ■ | |

*Outdoor Lighting and Glare*

The Project would increase the amount of light in the area above what is being generated by the vacant site by directly adding new sources of illumination including security and decorative lighting for the proposed structures. All outdoor lighting is required to be designed and installed to comply with §17.90.040- *Lighting,* of the Zoning Ordinance[6] which stipulates:

*"Except for residential light fixtures using less than a 75-watt bulb, the following shall apply to all outdoor lighting fixtures:*

*(a) All on-site lighting shall be energy efficient, stationary, and directed away from adjoining properties and public rights-of-way.*

*(b) Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.*

*(c) Light fixtures shall be shielded so no light above 0.5 footcandle spills over onto adjacent properties and rights-of-way. There shall be no spillover (0.0 footcandle) onto adjacent residential used or zoned properties"*

*Building Material Glare*

[6] Zoning Ordinance.

§17.20.040 (b) of the Zoning Ordinance requires siding material to consist of stucco, wood, brick, stone, or decorative concrete block which are non-reflective materials which do not result in glare. Windows in single family residential housing units are not of the size and scale where a large expanse of glass surface area will produce glare. In addition, single family homes typically have window coverings (shades, blinds etc. that reduce impacts from interior and exterior glare. Compliance with the above referenced Zoning Ordinance requirements will ensure that the Project will not adversely affect day or nighttime views in the area.

***Level of Significance:*** **Less than significant.**

# 4.2 Agriculture and Forestry Resources

| Threshold 4.2 (a) Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | | ■ |

## Impact Analysis

The Project site is designated is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program.[7] As such, development of the Project will not convert any type of farmland to a non-agricultural use.

***Level of Significance:*** No impact.

| Threshold 4.2 (b) Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | ■ | |

[7] https://databasin.org/maps/new/#datasets=b83ea1952fea44ac9fc62c60dd57fe48,accessed on March 6, 2-21.

## Impact Analysis

### *Agricultural Zoning*

The current zoning classification for the site is Single Family Residential (R1). The Single Family Residential (R1) zone district is a single-family zone which permits detached residences at a density of up to four (4) units per gross acre. Minimum lot size is 7,200 square feet. Development at this density requires full urban levels of service and public improvements.[8] Therefore, the Project would not conflict with existing zoning for agricultural use.

### *Williamson Act*

A Williamson Act Contract enables private landowners to voluntarily enter contracts with local governments for the purpose of establishing agricultural preserves. The Project site is not under a Williamson Act Contract.[9]

***Level of Significance:*** **No impact**.

| Threshold 4.2 (c) Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | | | | ■ |

## Impact Analysis

California Public Resources Code §12220(g) defines forest land as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

§4526 of the Code defines timberland as land, other than land owned by the federal government or land designated by the state as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.

[8] City of Adelanto Zoning Ordinance §17.02.010 (c),
[9] https://sbcountyarc.org/wp-content/uploads/arcforms/NPP874-WilliamsonActParcels.pdf, accessed March 6, 2021.

The Project site does not contain any forest lands, timberland, or timberland zoned as Timberland Production, nor are any forest lands or timberlands located on or nearby the Project site. Because no lands within the Project site are currently zoned or proposed for forestland or timberland, there is no potential to impact such zoning.

***Level of Significance:*** **No impact**.

| Threshold 4.2 (d) Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in the loss of forest land or conversion of forest land to non-forest use? | | | | ■ |

### Impact Analysis

As noted in the response to Threshold 4.2(c) above, the Project site and surrounding properties do not contain forest lands, are not zoned for forest lands, nor are they identified as containing forest resources by the *General Plan*. Because forest land is not present within the Project site or in the immediate vicinity of the site, the Project has no potential to result in the loss of forest land or the conversion of forest land to non-forest use.

***Level of Significance:*** **No impact**.

| Threshold 4.2 (e) Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | | | | ■ |

### Impact Analysis

As noted under Threshold 4.2 (a), the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. In addition, the site is not under agricultural production and there is no land being used primarily for agricultural purposes on or in the vicinity of the site.

***Level of Significance:*** **No impact**.

# 4.3 Air Quality

The following analysis is based in part on the following:

- *TTM 20398, Single-Family Residential Project, Air Quality and Greenhouse Gas Impact Study*, RK Engineering Group, Inc., which is dated July 27, 2021, and is included as Appendix A to this Initial Study.

- MDAQMD *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, February 2020,* available at: https://www.mdaqmd.ca.gov/rules/overview.

## Air Quality Setting

### *Topography and Climate*

The Project site is located within the Mojave Desert portion of the Mojave Desert Air Basin (MDAB) is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriel's by the Cajon Pass (4,200 ft). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley). The MDAB is classified as a dry-hot desert (BWh), with portions classified as dry-very hot desert (BWhh), to indicate at least three months have maximum average temperatures over 100.4° F.[10]

### *Air Pollutants and Health Effects*

Air Pollutants are the amounts of foreign and/or natural substances occurring in the atmosphere that may result in adverse effects to humans, animals, vegetation and/or materials. The Air Pollutants regulated by the MDAQMD that are applicable to the Project are described below.[11]

Carbon Monoxide (CO). A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. Carbon monoxide is harmful when breathed because it displaces oxygen in the blood and deprives the heart, brain, and other vital organs of oxygen.

Nitrogen Dioxide NOx). Nitrogen dioxide (NO2) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO2, creating the mixture of NO and NO2 commonly called NOx. NOx can irritate eyes, nose, throat, and lungs, possibly leading to coughing, shortness of breath, tiredness, and nausea.

Particulate Matter ($PM_{2.5}$ and $PM_{10}$): One type of particulate matter is the soot seen in vehicle exhaust. Fine particles — less than one-tenth the diameter of a human hair — pose a serious

[10] MDAQMD CEQA Guidelines, February 2020, Page 6-7.
[11] http://www.aqmd.gov/home/air-quality

threat to human health, as they can penetrate deep into the lungs. PM can be a primary pollutant or a secondary pollutant from hydrocarbons, nitrogen oxides, and sulfur dioxides. Diesel exhaust is a major contributor to PM pollution.

Sulfur Dioxide ($SO_2$). A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of $SO_2$. Sulfur dioxide irritates the skin and mucous membranes of the eyes, nose, throat, and lungs.

Ozone: Ozone is formed when several gaseous pollutants react in the presence of sunlight. Most of these gases are emitted from vehicle tailpipe emissions. Ozone can reduce lung function worsen bronchitis, emphysema, and asthma.

Volatile Organic Compounds (VOCs): VOCs contribute to the formation of smog and/or may themselves be toxic. VOCs often have an odor, and some examples include gasoline, alcohol and the solvents used in paints. Health effects may include eye, nose and throat irritation, headaches, loss of coordination, and nausea.

### *Non-attainment Designations and Classification Status*

The United States Environmental Protection Agency and the California Air Resources Board have designated portions of the District non-attainment for a variety of pollutants. An "attainment" designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a "nonattainment" designation indicates that a criteria pollutant concentration has exceeded the established standard. Table 4.3-1 shows the attainment status of criteria pollutants in the MDAB.

**Table 4.3-1- Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin**

| Criteria Pollutant | State Designation | Federal Designation |
|---|---|---|
| Ozone – 1-hour standard | Nonattainment | No Standard |
| Ozone – 8-hour standard | Nonattainment | Nonattainment |
| Respirable Particulate Matter ($PM_{10}$) | Nonattainment | Attainment |
| Fine Particulate Matter ($PM_{2.5}$) | Nonattainment | Nonattainment |
| Carbon Monoxide (CO) | Attainment | Unclassified/Attainment |
| Nitrogen Dioxide (N0x) | Attainment | Unclassified/Attainment |
| Sulfur Dioxide ($SO_2$) | Unclassified /Attainment | Unclassified/Attainment |
| Lead | Attainment | Attainment |

*Source: California Air Resources Board, 2015.*

As shown in Table 4.3-2 above, the MDAB is classified as Nonattainment for Ozone – 1-hour standard, Ozone – 8-hour standard, Respirable Particulate Matter ($PM_{10}$) and Fine Particulate Matter ($PM_{2.5}$)

| Threshold 4.3 (a). Would the Project: | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict with or obstruct implementation of the applicable air quality plan? | | | ■ | |

## Impact Analysis

The following analysis is consistent with the preferred analysis approach recommended by the MDAQMD *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines.*

### *Conformity with Air Quality Management Plans*

The Project is located within the Mojave Desert Air Basin and under the jurisdiction of the Mojave Desert Air Quality Management District. Under the Federal Clean Air Act the Mojave Desert Air Quality Management District has adopted a variety of attainment plans (i.e., "Air Quality Management Plans") for a variety of non-attainment pollutants. A complete list of the various air quality management plans is available from the Mojave Desert Air Quality Management District located at 14306 Park Avenue, Victorville, CA 92392 or on their website at: https://www.mdaqmd.ca.gov/rules/overview.

The Mojave Desert Air Quality Management District is responsible for maintaining and ensuring compliance with the various Air Quality Management Plans. Conformity is determined based on the following criteria:

- A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).

- A project is conforming if it complies with all applicable Mojave Desert Air Quality Management District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

### *Consistency with Emission Thresholds*

As shown in Tables 4.3.5 and 4.3.6 below, the Project would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or during long-term operation. Accordingly, the Project's air quality emissions are less than significant.

*Consistency with Control Measures*

The construction contractors are required to comply with rules, regulations, and control measures to control fugitive dust from grading (Rule 403) and the application of architectural coatings during building construction (Rule 1113).

*Consistency with Growth Forecasts*

The Project site is designated as R-1 (Single Family Residential) by the General Plan Land Use & Zoning Map. This land use designation is consistent with the land use plan that was used by the MDAQMD to generate the growth forecasts for the air quality plans referenced above.

***Level of Significance:*** **Less than significant**.

| Threshold 4.3 (b). Would the Project: | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | ■ | |

## Impact Analysis

The following provides an analysis based on the applicable regional significance thresholds established by the Mojave Desert Air Quality Management District to meet national and state air quality standards.

**Table 4.3.2. MDAQMD Air Quality Significance Thresholds**

| Pollutant | Daily Emissions (pounds/day) |
|---|---|
| Carbon Monoxide (CO) | 548 |
| Oxides of Nitrogen (NOx) | 137 |
| Volatile Organic Compounds (VOC) | 137 |
| Oxides of Sulphur (SOx) | 137 |
| Particulate Matter (PM10) | 82 |
| Particulate Matter (PM 2.5) | 65 |

*Source:* MDAQMD CEQA Guidelines, February 2020, Table 6.

Both construction and operational emissions for the Project were estimated based on a worst-case scenario of 89 dwelling units by using the California Emissions Estimator Model (CalEEMod)

which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model is authorized for use by the Mojave Desert Air Quality Management District.

### *Construction Emissions*

Construction of the Project is assumed to begin in the year 2022 and last approximately 21 months. Construction phases are assumed to consist of site preparation, grading, building construction, paving and architectural coating. The Project is expected to be operational in the year 2025. Construction phases are not expected to overlap. Construction activities produce combustion emissions from various sources (utility engines, tenant improvements, and motor vehicles transporting the construction crew). Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. The Project will be required to comply with several standard fugitive dust control measures, per MDAQMD Rule 403. The following measures were factored into CalEEMod and are based upon data provided from MDAQMD:

- Utilize soil stabilizers - 30% $PM_{10}$ and $PM_{2.5}$ reduction.
- Replace ground cover - 15% $PM_{10}$ and $PM_{2.5}$ reduction.
- Water exposed areas 2x per day.

Daily construction emissions based on the above-described parameters are shown in Table 4.3.3 below.

**Table 4.3.3. Construction Emissions**

| Maximum Daily Emissions | Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | NOx | ROG | CO | SOx | PM10 | PM2.5 |
| | 54.72 | 64.10 | 35.97 | 0.17 | 9.28 | 5.39 |
| **Regional Threshold** | **137** | **137** | **548** | **137** | **82** | **65** |
| **Exceeds Regional Threshold?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |

Source: MDAQMD and CalEEMod 2016.3.2

### *Operational Emissions*

The Project would be operated as a residential subdivision. Typical operational characteristics include residents and visitors traveling to and from the site, delivery of goods and services to the residents, and maintenance activities. Table 4.3-4 shows the Mojave Desert Air Quality Management District thresholds for operational emissions compared to the Project's maximum daily emissions.

**Table 4.3.4. Operational Emissions**

| Maximum Daily Emissions | Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | NOx | ROG | CO | SOx | PM10 | PM2.5 |
| | 6.81 | 4.62 | 30.74 | 0.06 | 5.31 | 1.59 |
| **Regional Threshold** | **137** | **137** | **548** | **137** | **82** | **65** |
| **Exceeds Regional Threshold?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |

Source: MDAQMD and CalEEMod 2016.3.2.

As shown in Table 4.3.4 above, both construction and operational related emissions would not exceed Mojave Desert Air Quality Management District thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during operation and would not contribute to an existing or projected air quality violation, on a direct or cumulative basis. As such, impacts are less than significant, and no mitigation measures are required.

***Level of Significance:*** **Less than significant.**

| Threshold 4.3 (d). Would the Project: | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Expose sensitive receptors to substantial pollutant concentrations? | | | | ■ |

## Impact Analysis

The Project is a residential subdivision and does not produce toxic air emissions such as those generated by industrial manufacturing uses or uses that generate heavy-duty diesel truck emissions. According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The nearest sensitive receptors are the residential neighborhood and the Sunset Ridge Park located approximately 100-feet north and 200- feet northeast of the Project site, respectively.

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

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

The Project is a proposal to construct 89 single-family units. The Project does not meet the criteria listed above. As such, no impact will occur.

***Level of Significance:*** **No impact.**

| Threshold 4.3 (d). Would the Project | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | ■ | |

### Impact Analysis

Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses.

The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

***Level of Significance:*** **Less than significant.**

## 4.4 Biological Resources

The analysis in this section is based in part on the following technical reports*:*

- *General Biological Resources Assessment,* RCA Associates, Inc., which is dated June 30, 2021, and is included as Appendix B to this Initial Study.
- *Preliminary Jurisdictional Delineation,* L&L Environmental, October 21, 2021.

| Threshold 4.4 (a) Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact 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? | | ■ | | |

## Impact Analysis

### *Plant Species*

The site was previously disturbed approximately 15 years ago and supports minimal vegetation. A few creosote bushes (Larrea tridentata), Russian thistle (Salsola tragus), matchweed (Gutierrezia sarothrae) and rabbitbrush (Chrysothamnus depressus) were observed. Based on the field surveys, there are no candidate, sensitive, or special status plant species present on the Project site.

### Western Joshua Tree

Western Joshua tree became a candidate species under the California Endangered Species Act (CESA), effective October 9, 2020. The CESA prohibits the take and possession of any species, or any part or product of a species that is designated by the California Fish and Game Commission as an endangered, threatened, or candidate species. As a candidate species, western Joshua tree now has full protection under CESA, and any take of the species (including removal of western Joshua tree or similar actions) will require authorization under CESA. No Joshua trees were observed on the site during the April 28, 2021, field investigations.

### *Wildlife Species*

Wildlife observed on the site, or which are expected to inhabit the site include jackrabbits *(Lepus californicus),* desert cottontails *(Sylvilagus audubonii),* Antelope ground squirrel *(Ammospermophilus leucurus),* and California ground squirrel (*Otospermophilus beecheyi).* Coyote (*Canis la trans)* dens and scat were observed on site, indicating coyotes utilize the site during hunting activities. Birds observed included ravens *(Corvus corax),* house finch *(Carpodacus mexicanus),* cactus wren *(Campylorhynchus brunneicapillus),* Anna's hummingbird *(Calypte anna),* greater roadrunner *(Geococcyx californianus),* black-chinned sparrow *(Spizella atrogularis),* and mourning dove *(Zenaida macroura).* Reptiles observed during the survey include desert spiny lizard *(Sceloporus magister),* and western whiptail lizard *(Cnemidophorus tigris).*

Table 4.4.1. *Presence of Candidate, Sensitive, or Special Status Wildlife Species*, provides a summary of all wildlife species that may be in the Project area.

**Table 4.4.1. Presence of Candidate, Sensitive, or Special Status Wildlife Species**

| Species | Status |
|---|---|
| Desert Tortoise | **Not Present:** Site is located within the known distribution of the documented species. Focused surveys observation within conducted on site did not identify any tortoises. |
| Mohave Ground Squirrel | **Not Present:** Site supports marginal habitat for the species. Species is not expected to observations occur on the site. |
| Swainsain's Hawk | **Not Present.** There is no habitat that the supports the species. |
| Le Conte's thrasher | **Not Present**. Site does support suitable habitat for the species; however, no thrashers observations observed during field within two surveys. |
| Burrowing Owl | **Not Present/Future Presence Possible.** No owls or owl sign (whitewash, etc.) were seen on the property during the survey. However, there is a possibility of owls moving onto this site in the future based on the presence of suitable burrows for utilization. Therefore, Mitigation Measure BIO-1. *30-day Pre-Construction Burrowing Owl Survey* is required. |

### Wildlife Species Mitigation Measures

Although wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service were not detected on-site., the site is located within the range of the Burrowing Owl, Mojave Ground Squirrel, Desert Tortoise, and Nesting Birds. Therefore, the following mitigation measures have been included to ensure any impacts are less than significant to these species.

***Mitigation Measure BIO-1. Burrowing Owl Pre-Construction Survey.*** *Prior to any ground disturbance, pre-construction surveys for Burrowing Owls on the project site and in the surrounding area in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, shall be conducted no more than 14- prior to the beginning of project activities 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 owl or sign thereof 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 or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to*

*CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Mitigation Measure BIO-2 shall apply.*

***Mitigation Measure BIO-2. Burrowing Owl Avoidance/Relocation.*** *If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist and shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. DocuSign Envelope ID: 2BD718C5-DD3E-4A96-B000-AF4661183895 James Hirsch, Contract Planner City of Adelanto November 18, 2021, Page 5 of 22 If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.*

***Mitigation Measure BIO-3. Mojave Ground Squirrel Pre-Construction Survey.*** *Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010), or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50- foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.*

***Mitigation Measure BIO-4. Desert Tortoise Pre-Construction Survey****. A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert*

*tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.*

***Mitigation Measure BIO-5. Nesting Bird Pre-Construction Survey.*** *If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 300- foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1) a nesting bird survey shall be conducted by a qualified biologist no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading prevent impacts to birds and their nests. The survey will be conducted by a qualified biologist. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is need for this measure.*

With implementation of Mitigation Measures BIO-1 through BIO-5, impacts would be less than significant relating to candidate, sensitive, or special status wildlife species.

| Threshold 4.4 (b). Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | | | | ■ |

### Impact Analysis

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site or in the adjacent habitats.

***Level of Significance:*** **No impact**.

| Threshold 4.4 (c) Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | ■ | | |

## Impact Analysis

Two (2) shallow bedded channels are present on the Project, one (1) along the eastern boundary and one (1) crosses the northwestern corner. These channels are further described as follows:

*CDFW Streambed 1*

The Project will impact 0.43 acre of CDFW combined streambed/wetlands within Streambed 1 and 0.003 acre of possibly federal non-wetland Waters of the U. S., that may also be subject to regulation by the RWQCB. The plan indicates total streambed area present will not be reduced, but temporary impacts will occur, and it will be shifted east so that flows will run along the eastern project boundary. As a result, consultation with CDFW, RWQCB, and USACE is required and a 1602 (Streambed Alteration Agreement) is required. Section 404/401 Clean Water Act permits may also be required; however, if not, a State Porter Cologne permit may be required.

*CDFW Streambed 2*

The Project was designed to eliminate impacts to Streambed 2, which is possibly Waters of the U. S. The 0.03 acre of CDFW streambed and possibly 0.003 acre of Waters of the U. S. will be avoided according to the available plan. Consultation with the USACE and RWQCB will be necessary to determine which portions of the project they may control and, therefore, which (if any) permits would be required

*Total Resources*

20,510 square feet (0.47 acre) of combined CDFW streambed and wetland present within the Project, of which 2,217 square feet (0.05 acre) are possibly federal waters; however, no clear downstream connection to navigable waters or qualifying federal wetlands was. No federal wetlands are present. However, all jurisdictional determinations are considered preliminary until verified by the agencies. Consultation with the USACE and RWQCB will be necessary to determine

which portions of the project they may control and, therefore, which (if any) permits would be required.

To avoid potential impacts to the area containing potential jurisdictional waters, the following mitigation measure is required:

***Mitigation Measure BIO-6. Compensatory Mitigation for Jurisdictional Waters.*** Prior to the issuance of a grading permit or any earth disturbing activities within the jurisdictional waters identified in the *Preliminary Jurisdictional Delineation for TTM 20398, City of Adelanto, San Bernardino County, California,* prepared by L&L Environmental dated October 31, 2021, the Project Applicant shall obtain any required regulatory permits required by California Department of Fish & Wildlife (CDFW), US Army Corps and a Section 401 Water Quality Certification from the RWQCB for temporary and/or permanent impacts to the jurisdictional area that are regulated by the USACE, CDFW, and the RWQCB. Impacts shall be mitigated to achieve a "no net loss", or as modified by the regulatory agencies through the permitting process.

***Level of Significance:*** **Less than significant with Mitigation Incorporated.**

| Threshold 4.4 (d). Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | ■ | | |

## Impact Analysis

Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. Corridors effectively act as links between different populations of a species. The Project site does not represent a wildlife travel route, crossing or regional movement corridor between large open space habitats. The Project Site is bordered by vacant land to the north, Seneca Road to the south, residential development to the east, and vacant land to the west followed by Calendula Road. Development of the Project site will be a continuation of the existing residential development pattern from the east. As such, the Project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors.

***Level of Significance***: **Less than significant.**

| Threshold 4.4 (e) Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | | ■ |

## Impact Analysis

The Project site was previously disturbed approximately 15 years ago and supports minimal vegetation. A few creosote bushes (Larrea tridentata), Russian thistle (Salsola tragus), matchweed (Gutierrezia sarothrae) and rabbitbrush (Chrysothamnus depressus) were observed. As such, the Project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

***Level of Significance***: **No Impact**.

| Threshold 4.4 (f) Would the project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | | | | ■ |

## Impact Analysis

Habitat Conservation Plans (HCPs) are planning documents required as part of an application for an incidental take permit for a protected species. They describe the anticipated effects of the proposed taking; how those impacts will be minimized or mitigated; and how the HCP is to be funded. Natural Community Conservation identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. According to the *California Natural Community Conservation Plans Map* maintained by the California Department of Fish and Wildlife, there are no such plans that encompass the Project site.[12]

***Level of Significance***: **No Impact**.

[12] *California Natural Community Conservation Plans Map*, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed on June 1, 2021.

# 4.5 Cultural Resources

The analysis in this section is based in part on the following technical report*: Cultural Resources Assessment, (Phase I),* RCA Associates, which is XX, and is included as Technical Appendix C to this Initial Study.

| Threshold 4.5 (a) | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5? | | | | ■ |

## Impact Analysis

### *Records Search*

The South Coastal Central Information Center (SCCIC), which is one of twelve regional Information Centers that comprise the California Historical Resources Information System (CHRIS), conducted an archaeological resources records search on April 19, 2017, for the Project site and ½ mile radius surrounding the site. CHRIS works under the direction of the California Office of Historic Preservation (OHP) and the State Historic Resources Commission (SHRC). The SCCIC houses information about historical resources (e.g., location, size, age, etc.) within the area. The search included a review of all recorded archaeological and built-environment resources and a review of cultural resource reports on file. In addition, The California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), and the California State Historic Properties Directory (HPD) listings were all reviewed for the Project site. Data from the SCCIC revealed that no historical cultural resources have been previously recorded within the Project site.

### *Field Survey*

During the field survey, the Project site was inspected for the presence of any cultural resources, including prehistoric, or historical buildings. No historic cultural resources were identified within the boundaries of the site. The site is heavily disturbed along Seneca Road, showing signs of vehicle and foot tracks. Throughout the site, there are some signs of minor but frequent human disturbances, such as left-behind garbage.

## Conclusions

Based on the records search and field survey, no cultural resources, including historic and prehistoric sites or historic-period buildings within the Project site. Research results, combined

with surface conditions have failed to indicate sensitivity for buried cultural resources. No additional cultural resources work, or monitoring is necessary during proposed activities associated with the development of the earthmoving activities.

***Level of Significance:*** **No impact.**

| Threshold 4.5 (b) | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5? | | ■ | | |

## Impact Analysis

### *Archaeological Setting*

Although no archaeological resources were found during the field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Therefore, the following mitigation measure is recommended:

## Mitigation Measure(s)

*Prior to the issuance of a grading permit, the following notes shall be placed on the grading plan:*

*"**CR-1: Archaeological Inadvertent Discovery**. If archaeological resources are encountered during implementation of the Project, ground-disturbing activities will be temporarily redirected from the vicinity of the find. The Project Archaeologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity to make an evaluation of the find. If the resource is significant, Mitigation Measure CR-2 shall apply.*

***CR-2: Archeological Treatment Plan**. If a significant archaeological resource(s) is discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor, the Project Proponent, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resource(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the archaeological resource(s) in accordance with current professional archaeology standards (typically this sampling level is two*

*(2) to five (5) percent of the volume of the cultural deposit). At the completion of the laboratory analysis, any recovered archaeological resources shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City of Adelanto Planning Department and the South-Central Coastal Information Center."*

***Level of Significance:*** With implementation of Mitigation Measures CR-1 and CR-2, impacts are **less than significant.**

| Threshold 4.5 (c) Would the Project: | Potentially Significant or Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Disturb any human remains, including those interred outside of formal cemeteries? | | | ■ | |

### Impact Analysis

The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. If human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq.

***Level of Significance:*** With implementation of the California Health and Safety Code, impacts would be **less than significant**.

## 4.6 Energy

| Threshold 4.6 (a) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | ■ | |

## Impact Analysis

### *Electricity and Natural Gas*

#### Construction

The Project would require the use of electric power tools. The anticipated construction schedule assumes the Project would be built-out in approximately 21 months. The consumption of electricity would be temporary in nature and would not represent a significant demand on available supplies. The use of natural gas is not anticipated to be used during construction.

#### Operations

Occupancy of the single-family residences would result in the consumption of natural gas and electricity. Energy demands are estimated at 2,517,540 kBTU/year of natural gas and 817, 102 kWh/year of electricity[13]. Natural gas would be supplied to the Project by Southwest Gas Corporation and electricity would be supplied by SCE. The Project proposes single-family homes reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other single-family land use projects of similar scale and configuration. The Project will also comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards.

In addition, the Project will be required to provide rooftop solar panels, or sources of on-site renewable energy, per the latest 2019 California Energy Code requirements. The Energy Code requires all new residential construction to achieve net-zero emissions associated with electricity usage using on-site renewable sources. This analysis has conservatively assumed 80% of electricity usage will be captured via on-site renewable sources (i.e., solar panels), as part of the project design.

### *Motor Vehicle Fuels*

#### Construction

Most activities would use fuel powered equipment and vehicles that would consume gasoline or diesel fuel. Heavy construction equipment (e.g., dozers, graders, backhoes, dump trucks) would be diesel powered, while smaller construction vehicles, such as pick-up trucks and personal vehicles used by workers would be gasoline powered.

The consumption of fuel would be temporary in nature and would not represent a significant demand on available supplies. Given the physical characteristics of the site and the type of

[13] Appendix A, *Air Quality and Greenhouse Gas Impact Study.*.

development proposed, there are no unusual Project characteristics or construction processes that would require the use of equipment that would use more fuel than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). In addition, as required by state law[14], idling times of construction vehicles is limited to no more than five minutes, thereby minimizing, or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Operations

Fuel that would be consumed by Project-generated traffic is a function of total vehicles miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. The Project will result in 2,357,628 annual VMT and an estimated annual fuel consumption of 91,376 gallons of fuel.[15]

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands.

### Conclusion

As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

***Level of Significance***: **Less than significant**.

| **Threshold 4.6(b). Would the Project:** | **Potentially Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | ■ | |

[14] California Code of Regulations Title 13, Motor Vehicles, §2449(d)(3) Idling.
[15] EPA, *2020 Automotive Trend Report*, https://www.epa.gov/automotive-trends/explore-automotive-trends-data, accessed July 27, 2021.

### Impact Analysis

The regulations directly applicable to the Project are *Building Energy Efficiency Standards*, Title 24, Part 6, and *CALGreen* Title 24, Part 11. These regulations include but are not limited to the use of energy efficient heating and cooling systems, water conserving plumbing and water-efficient irrigation systems. The Project is required to demonstrate compliance with these regulations as part of the building permit and inspection process.

***Level of Significance***: **Less than significant.**

## 4.7 Geology And Soils

| **Threshold 4.7(a). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| 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. | | | | ■ |

### Impact Analysis

Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California. (A trace is a line on the earth's surface defining a fault.) Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally fifty feet).[16] According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located within an Alquist-Priolo Earthquake Fault zone.[17]

***Level of Significance:*** **No impact.**

| **Threshold 4.7(a1). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| Strong seismic ground shaking? | | | ■ | |

[16] https://www.conservation.ca.gov/cgs/alquist-priolo.
[17] https://maps.conservation.ca.gov/geologichazards/#dataviewer, accessed July 15,2021.

### Impact Analysis

The Project site is in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the Southern California area. As a mandatory condition of Project approval, the Project would be required to construct the proposed structures in accordance with the seismic design criteria mandated by the Adelanto Municipal Code Title 14, *Buildings and Construction*. The purpose of this Title is, in part, to provide minimum standards to safeguard life or property by stipulating building and foundation requirement to withstand earthquake.

***Level of Significance:*** **Less than significant**.

| **Threshold 4.7(a2). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| Seismic-related ground failure, including liquefaction? | | | ■ | |

### Impact Analysis

According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located in a liquefaction zone.[18] Notwithstanding, the Project would be required to comply with Development Code Section 16-5.02.060 (b) (2), *Soils Engineering Report*, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

***Level of Significance:*** **Less than significant**.

| **Threshold 4.7(a3). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| Landslides? | | | | ■ |

[18] https://maps.conservation.ca.gov/geologichazards/#dataviewer, accessed March 15,2021.

### Impact Analysis

The site is relatively flat and is not adjacent to any slopes or hillsides that could be potentially susceptible to landslides.

***Level of Significance:*** **No Impact**.

| Threshold 4.7(b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in substantial soil erosion or the loss of topsoil? | | | ■ | |

### Impact Analysis

The Project will not result in substantial soil erosion or the loss of topsoil, because the site will be paved and landscaped after it is developed. To control soil erosion during construction, the Project proponent is required to comply with Chapter 17.93-*Erosion and Sediment Control*, of the Adelanto Municipal Code which serves to implement the National Pollutant Discharge Elimination System requirements applicable to the Project area and prepare a Storm Water Pollution Prevention Plan. In addition, a Water Quality Management Plan is required which addresses post-construction soil erosion. Preparation and implementation of these plans is a mandatory requirement. Therefore, impacts are less than significant, and no mitigation measures are required. (Also see analysis under Issue 3.9).

***Level of Significance:*** **Less than significant**.

| Threshold 4.7(c). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse? | | | ■ | |

## Impact Analysis

### *Landslide/Lateral Spreading*

Lateral spread or flow are terms referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water. All the land within the Project site is relatively flat and according to the County of San Bernardino Hazard Maps, is not located in areas prone to landslides and thus there are no slopes that may contribute to lateral spreading.

### *Subsidence*

Subsidence is the downward movement of the ground caused by the underlying soil conditions. Certain soils, such as clay soils are particularly vulnerable since they shrink and swell depending on their moisture content. Subsidence is an issue if buildings or structures sink which causes damage to the building or structure. Subsidence is usually remedied by excavating the soil the depth of the underlying bedrock and then recompacting the soil so that it can support buildings and structures.

### *Liquefaction or Collapse*

Liquefaction may occur during seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause soils to liquefy and temporarily behave as a dense fluid

Collapse occurs in saturated soils in which the space between individual particles is filled with water. This water exerts a pressure on the soil particles that influences how tightly the particles themselves are pressed together. The soils lose their strength beneath buildings and other structures.

Based on the California Geological Survey, the site is not mapped within a zone of potentially liquefiable soils. Based on groundwater data (http://www.water.ca.gov/waterdatalibrary/), it is estimated that groundwater is at a depth greater than 50 feet below existing grade. The site is also not included within the San Bernardino County Geologic Hazards Maps as being located within an area with a liquefaction hazard. Liquefaction is not considered to be a hazard at the subject site due to the great depth to groundwater (greater than 50 feet) and the current geologic hazard mapping. As such, impacts would be less than significant, and no impacts related to subsidence, liquefaction and collapse will occur through compliance with the California Building Standards Code also known as California Code of Regulations Title 24.

***Level of Significance:*** **Less than significant**.

| Threshold 4.7(d) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property? | | | ■ | |

### Impact Analysis

Expansive soils generally consist of clay that tend to expand (increase in volume) as it absorbs water, and it will shrink (lessen in volume) as water is drawn away. According to the Natural Resources Conservation Service, United States Department of Agriculture, Web Soil Survey, the Project site primarily consists of soils classified as "Bryman series."[19]

The Bryman series consists of deep, well drained soils that formed in alluvium from dominantly granitic sources. The Bryman series is not a clay soil and is generally not susceptible to expansion. Notwithstanding, the Project would be required to comply with Adelanto Municipal Code §16.04.050 which sets forth the procedures governing the requirements for soils reports, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

***Level of Significance:*** **Less than significant.**

| Threshold 4.7(e) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | | | | ■ |

[19] Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at the following link: http://websoilsurvey.sc.egov.usda.gov/. Accessed June 1, 2021.

### Impact Analysis

The Project does not propose the use of septic tanks or alternative wastewater disposal systems. The Project would install domestic sewer infrastructure and connect to the City of Adelanto's sewer conveyance and treatment system.

***Level of Significance:*** **No impact.**

| Threshold 4.7(f) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | ■ | | |

### Impact Analysis

Paleontological resources are the preserved fossilized remains of plants and animals. Fossils and traces of fossils are preserved in sedimentary rock units, particularly fine- to medium grained marine, lake, and stream deposits, such as limestone, siltstone, sandstone, or shale, and in ancient soils. They are also found in coarse-grained sediments, such as conglomerates or coarse alluvium sediments. Fossils are rarely preserved in igneous or metamorphic rock units. Fossils may occur throughout a sedimentary unit and, in fact, are more likely to be preserved subsurface, where they have not been damaged or destroyed by previous ground disturbance, amateur collecting, or natural causes such as erosion.

The property is situated in the Mojave Desert geomorphic province. The Mojave Desert province is a wedge-shaped area that is enclosed on the southwest by the San Andreas fault zone, the Transverse Ranges province, and the Colorado Desert province, on the north and northeast by the Garlock fault zone, the Tehachapi Mountains and the Basin and Range province, and on the east by the Nevada and Arizona state lines, and the Colorado River. The area is dominated by broad alluviated basins that are mostly aggrading surfaces that are receiving non-marine continental deposits from the adjacent upland areas. More specific to the subject property, the site is in an area geologically mapped to be underlain by alluvium. Alluvium has the potential to contain paleontological resources. Therefore, the following mitigation measures are required.

### Mitigation Measures

***GEO-1: Inadvertent Discovery of Paleontological Resources.*** *If paleontological resources are encountered during implementation of the Project, ground-disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist (the "Project Paleontologist") shall be retained by the developer to make an evaluation of the find. If the resource is significant, Mitigation Measure GEO-2 shall apply.*

***GEO-2: Paleontological Treatment Plan.*** *If a significant paleontological resource(s) is discovered on the property, in consultation with the Project proponent and the City, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.*

With implementation of Mitigation Measures GEO-1 and GEO-2, impacts are less than significant regarding paleontological resources.

*Unique Geologic Feature*

The Project site is relatively flat. The site soils generally consist of Cajon Sand which is a common soil type in Victorville. As such, the Project does not contain a geologic feature that is unique or exclusive locally or regionally.

***Level of Significance:*** **Less than significant** with mitigation incorporated for paleontological resources.

## 4.8 Greenhouse Gas Emissions

The following documents were used in the preparation of this analysis:

- *TTM 20398, Single-Family Residential Project, Air Quality and Greenhouse Gas Impact Study*, RK Engineering Group, Inc., which is dated July 27, 2021, and is included as Appendix A to this Initial Study.

- Mojave Desert Air Quality Management District, *California Environmental Quality Act (CEQA) And Federal Conformity Guidelines,* February 2020.

| ***Threshold 4.8 (a-b) Would the Project:*** | **Potentially Significant or 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? | | | ■ | |

### Impact Analysis

According to CEQA Guidelines Section 15064.4, when making a determination of the significance of greenhouse gas emissions, the "*lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use*." Moreover, CEQA Guidelines section 15064.7(c) provides that "*a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts*" on the condition that "the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

The City of Adelanto has not adopted Greenhouse Gas (GHG) thresholds of significance; therefore, the Mojave Desert Air Quality Management District threshold will be utilized.

### *Mojave Desert Air Quality Management District Thresholds of Significance*

The Mojave Desert Air Quality Management District (MDAQMD) has established GHG significance thresholds on a daily and annual basis. A summary of the projected annual operational greenhouse gas emissions, including amortized construction-related emissions associated with the development of the Project is provided in Table 4.8-1.

**Table 4.8.1. Project Greenhouse Gas Emissions**

| GHG Emission Source | Daily Emissions | Daily Threshold | Annual Emissions | Annual Threshold | Exceeds Threshold? |
|---|---|---|---|---|---|
| Construction 2022 | 18,046 | **548,000** | 797.7 | **100,000** | **NO** |
| Construction 2023 | 5,070 | **548,000** | 375.9 | **100,000** | **NO** |
| Operations | 8,146.7 | **548,000** | 1,063.3 | **548,000** | **NO** |

*Source: Air Quality and Greenhouse Gas Impact Study* (Appendix A).

As shown on Table 4.8-1, the Project's greenhouse gas emissions on both a daily and annual basis would not exceed the MDAQMD's significance thresholds. Thus, Project-related emissions would not have a significant direct or indirect impact on greenhouse gas emissions that could impact climate change and no mitigation or further analysis is required.

| ***Threshold 4.8 (b) Would the Project:*** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | ■ | |

**Impact Analysis**

In 2006, the California legislature passed Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006. The law establishes a limit on greenhouse gas (GHG) emissions for the state of California to reduce state-wide emissions to 1990 levels by 2020. In 2016, the California Assembly and Senate expanded upon AB 32 with Senate Bill (SB) 32, which mandates a 40% reduction in GHG emissions from 1990 levels by 2030. In January 2017, the California Air Resources Board (CARB) developed a plan (SB 32 Scoping Plan1) that charted a path towards the GHG reduction goal using all technologically feasible and cost-effective means.

In response to these initiatives, an informal project partnership, led by the San Bernardino Council of Governments (SBCOG), adopted the *San Bernardino County Regional Greenhouse Gas Reduction Plan*.[20]The Reduction Plan summarizes the actions that 23 jurisdictions selected to reduce jurisdictional GHG emissions, as well as state-mandated actions. The Reduction Plan is not mandatory for the partnership jurisdictions. Instead, it provides information that can be used by partnership jurisdictions, if they choose so, to develop individual climate action plans (CAPs).

Pursuant to the Plan, the City of Adelanto selected a goal to reduce its community GHG emissions to a level that is 40% below its 2020 GHG emissions level by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost effective through a combination of state (~60%) and local (~40%) efforts.

At the project level, prior to issuance of a building permit, the Project Proponent is required to submit plans showing that the Project will be constructed in compliance with the most recently adopted edition of the applicable California Energy Code, (Part 6 of Title 24 of the California Code of Regulations) and the California Green Building Standards Code, 2019 Edition (Part 11 of Title 24 of the California Code of Regulations).

Applicable measures to a single-family residential include, but are not limited to:

- *Energy Efficiency:* The Project is required to provide electric vehicle (EV) charging outlets; install energy efficient appliances and HVAC systems, and overall residential buildings shall meet or exceed the minimum standard design required by the 2019 California Energy Code.

- *Waste Diversion* -The Project's waste hauler would be required to comply with all applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the landfills that serve the Project are reduced in accordance with existing regulations. In addition, The Project is required to submit and implement a construction waste management plan to reduce the amount of construction waste transported to landfills.

[20] San Bernardino County Regional Greenhouse Gas Reduction Plan ,available at: https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf, accessed on July 6,2021.

- *Water Conservation*-Utilize water conservation techniques to conserve water resources, such as the use of low-flow irrigation and plumbing systems.

- *Water-Efficient Landscaping Practices*-Promote low per capita water use using low water consumptive plant materials/desert plants (xeriscape).

Based on the analysis above, the Project will not conflict with regional or State plans to reduce greenhouse gas emissions and will support the 40 percent long-term reduction in greenhouse gas emissions identified in the Reduction Plan.

***Level of Significance:*** **Less than significant.**

# 4.9 - Hazards And Hazardous Materials

| Threshold 5.9(a) (b) | 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? | | | ■ | |

## Impact Analysis

### *Existing Conditions*

The Project site has been subject to severe artificial disturbances associated with modern refuse dumping and adjacent street, sidewalk, and residential property construction. There have been no previous activities, including agricultural production, that could result in the release of surface or subsurface hazardous materials during the construction phase of the Project.

### *Construction Activities*

Construction contractors are required to comply with all applicable federal, state, and local laws and regulations regarding hazardous materials, including but not limited requirements imposed by the Environmental Protection Agency, California Department of Toxic Substances Control, Mojave Desert Air Quality Management District, and the Lahontan Regional Water Quality Control Board. As such, impacts due to construction activities would not cause a significant

hazard to the public or the environment through the release of hazardous materials to the environment.

*Operational Activities*

The Project site would be developed with residential land uses which is a land use not typically associated with the transport, use, or disposal of hazardous materials. Although residential land uses may utilize household products that contain toxic substances, such as cleansers, paints, adhesives, and solvents, these products are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to/from or use at the Project site.

***Level of Significance:*** **Less than significant**.

| Threshold 4.9 (c) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | ■ | |

## Impact Analysis

As measured from property line to property line, The Project site is located across Rhode Island Street from George Visual and Performing Arts Magnet and Middles School. As discussed in the responses to Thresholds 4.9 (b) and 4.9 (c) above, all hazardous or potentially hazardous materials would comply with all applicable federal, State, and local agencies and regulations with respect to hazardous materials. Therefore, regardless of the proximity of planned or proposed schools, the Project will not impact schools.

***Level of Significance:*** **Less than significant**.

| Threshold 4.9 (d) Would the Project | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would it create a significant hazard to the public or the environment? | | | | ■ |

## Impact Analysis

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State and local agencies to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites pursuant to Government Code Section 65962.5. Below are the data resources that provide information regarding the facilities or sites identified as meeting the Cortese List requirements.

- □ *List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.*
- □ *List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.*
- □ *List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit.*
- □ *List of "active" CDO and CAO from Water Board.*
- □ *List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.*

Based on a review of the Cortese List maintained by the California Environmental Protection Agency the Project site is not identified on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. [21]

***Level of Significance:*** **No impact.**

| Threshold 4.9 (e) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area? | | | | ■ |

## Impact Analysis

[21] California Environmental Protection Agency, Cortese List Data Resources, https://calepa.ca.gov/sitecleanup/corteselist/ , accessed July 8, 2021.

The Project site is located within the boundaries of the *Comprehensive Land Use Plan, Southern California Logistics Airport,* not located within an airport land use plan[22]. The nearest airports from the site are Hesperia Airport located approximately 6 miles southeast and the Southern California Logistics Airport approximately 8 miles south.

***Level of Significance:*** **No impact**.

| Threshold 4.9 (f) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | ■ | |

## Impact Analysis

Access to the Project site is proposed from Seneca Road. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles from Seneca Road.

***Level of Significance:*** **Less than significant**.

[22] https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx, accessed on April 25, 2021.

| Threshold 4.9 (g) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | ■ |

### Impact Analysis

According to the *California Fire Hazard Severity Zone Viewer* maintained by Cal Fire, the Project site is not located within a high wildfire hazard area[23]. Also refer to analysis under Section 4.20, *Wildfire*.

***Level of Significance:*** **No impact**.

## 4.10 Hydrology and Water Quality

| Threshold 4.10 (a) Would the Project: | Potentially Significant or 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? | | | ■ | |

### Impact Analysis

#### *Water Quality Standards*

Construction Impacts

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and the installation of landscaping, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction activities in the absence of any protective or avoidance measures.

[23] https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, accessed on April 25, 2021.

Chapter 17.93.050 - *Soil Erosion and Sediment Control Plan* of the Adelanto Municipal Code requires the Project to obtain a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit for construction activities. The permit is required for all Projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area.

Compliance with the permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) will identify construction Best Management Practices (BMPs) that will be implemented to prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. Typical BMPs measures include, but are not limited to, preserving natural vegetation (being implemented in Lot B), stabilizing exposed soils; use of sandbags, and installation of temporary silt fencing.

### Operational Impacts

Storm water pollutants commonly associated with residential land uses include sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides. City of Adelanto Municipal Code Chapter 17.93.060 requires the preparation of a Water Quality Management Plan (WQMP) for managing the quality of storm water or urban runoff that flows from a developed site after construction is completed. The Project will comply with the City of Adelanto and the Phase II Small MS4 General Permit for the Mojave River Watershed. The s Project proposes to use roads within the Project site to carry runoff to a proposed water quality basin located at the northeast portion of the site. The basin is designed for stormwater treatment through infiltration provided at the bottom of the basin, where the required volume will infiltrate through the site soils and into the groundwater, before discharging to the existing storm drain in Seneca Road.

### *Waste Discharge Requirements*

Waste Discharge Requirements are issued by the Lahontan Regional Board under the provisions of the California Water Code, Division 7 "Water Quality," Article 4 "*Waste Discharge Requirements.*"[24] These requirements regulate the discharge of wastes which are not made to surface waters, but which may impact the region's water quality by affecting underlying groundwater basins. Discharge requirements are issued for Publicly Owned Treatment Works' wastewater reclamation operations, discharges of wastes from industries, subsurface waste discharges such as septic systems, sanitary landfills, dairies, and a variety of other activities which can affect water quality.

[24] California Water Boards, *Waste Discharge Requirements Program*, July 3, 2020. Available at: https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/

### *Operational Impacts (Waste Discharge Requirements)*

The State Water Resources Control Board ("State Water Board") adopts statewide general waste discharge requirements for all sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California. The Order establishes requirements for enrollees to operate and maintain their collection systems.

The Adelanto Public Works Authority is an enrollee under this general permit and operates the City's wastewater treatment plan pursuant to WWTP Order No. R6V-2013-0058 and WDID No. 6B369805001. PERC Water Corporation operates the plant on behalf of the City. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program to ensure the plant is operating in compliance with waste discharge requirements.

***Level of Significance:*** **Less than significant.**

| Threshold 4.10 (b) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | | | ■ | |

## Impact Analysis

### *Ground Water Supply Discussion*

The Project would be served with potable water by the Adelanto Public Utility Authority. Adelanto has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.[25] The Mojave Basin Area was the subject of a court ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. The court ordered adjudication of the Mojave Basin Area allocates a variable free production allowance (FPA) to each purveyor that supplies more than 10 AFY, including Adelanto.

Each allocated FPA represents the purveyor's share of the water supply available from the MWA Subarea. FPAs are determined as a percentage of the purveyor's highest verified annual use from

[25] *Victorville Urban Water Management Plan*, June 6, 2016, p. 23, accessed on April 25, 2021.

1986 to 1990. The FPA, which is currently set at 80 percent of BAP for agriculture and 60 percent of BAP for municipal and industrial (M&I), can vary from year to year depending on the Watermaster's safe yield projections for the Basin. If Adelanto, or another purveyor, pumps more than its allotted FPA in any year, they are required to purchase replacement water equal to the amount of production in excess of the FPA. Replacement obligations are satisfied by paying MWA and then purchasing unused FPA within the subarea.

Given the City's total reliance on groundwater, the reliability of the City's water supply is thus entirely dependent on the reliability of the groundwater in the Mojave River Basin managed by the Mojave Water Agency. Because almost all of the water used within the Mojave Water Agency's service area is supplied by pumped groundwater, to supplement the local groundwater supplies, the Mojave Water Agency recharges the groundwater basins with State Water Project imported water, natural surface water flows, wastewater imports from outside the Mojave Water Agency's service area, agricultural depletion from storage, and return flow from pumped groundwater not consumptively used. The Mojave Water Agency's sources are only used to recharge the groundwater basins and are not supplied directly to any retailers, except for two power plants, the High Desert Power Project, and the LUZ Solar Plant.

### *Groundwater Recharge Discussion*

Development of the Project would increase impervious surface coverage on the Project site which would in turn reduce the amount of direct infiltration of runoff into the ground. The Project proposes to use roads within the Project site to carry runoff to a proposed water quality basin, designed for both retention and detention. As such, the Project will not interfere substantially with groundwater recharge.

In addition, according to a review of historical groundwater data (California Department of Water Resources and California State Water Resources Control Board groundwater well data [http://wdl.water.ca.gov and http://geotracker.waterboards.ca.gov]), depth to groundwater is greater than 50 feet below ground surface (bgs) in the general Project site area. As such, the Project will not impact groundwater.

### *Sustainable Groundwater Management Discussion*

California depends on groundwater for a major portion of its annual water supply, particularly during times of drought. This reliance on groundwater has resulted in overdraft and unsustainable groundwater usage in many of California's basins.[26] The Sustainable Groundwater Management Act (SGMA) was enacted to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The City of Adelanto is located within the Upper Mojave River Valley portion of the Mojave River Basin.

[26] https://www.waterboards.ca.gov/water_issues/programs/gmp/, accessed on July 23, 2021.

The Mojave River is an adjudicated basin (i.e. water rights are determined by court order).[27] Adjudicated basins are exempt from the SGMA because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of a basin. No component of the Project would obstruct with or prevent implementation of the management plan for the Mojave River Basin. As such, the Project would not conflict with any sustainable groundwater management plan. Impacts would be less than significant

### Conclusion

Based on the analysis above, the Project is not forecast to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

***Level of Significance.*** **Less than significant**.

| **Threshold 4.10 (c). Would the Project:** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| 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 that would: | | | | |
| (i) Result in substantial erosion or siltation on- or off-site? | | | ■ | |
| (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? | | | ■ | |
| (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | | | ■ | |
| (iv) Impede or redirect flood flows? | | | ■ | |

[27] https://gis.water.ca.gov/app/bp-dashboard/final/, accessed on July 23, 2021.

## Impact Analysis

### *Existing Condition*

The Project site is vacant, undeveloped, and undisturbed land with slight slope from the southwest corner to the northeast corner of the site. The runoff from the subject site is primarily sheet flow. The site drains northeasterly where it will discharge into the existing drainage course located within proposed Lot B.

### *Proposed Condition*

The proposed condition is to use a basin for water quality and flood routing to manage the Project runoff. Post development runoff will be conveyed by the internal street system and then routed through the proposed basin located in the northeast corner of the site. The basin is designed with a sufficient size to handle water quality through infiltration, and flood mitigation through retention.

Based on information contained on TTM No. 20398, as proposed, the design of the storm drain system will manage runoff so that the Project will not result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows.

***Level of Significance.*** **Less than significant.**

| Threshold 4.10 (d). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | | ■ |

## Impact Analysis

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.[28] According to the California Department of Conservation, California

[28] https://www.fema.gov/flood-maps, accessed on April 25, 2021.

Official Tsunami Inundation Maps[29], the site is not located within a tsunami inundation zone. In addition, the Project would not be at risk from seiche because there is no water body around the Project site capable of producing as seiche.

***Level of Significance:*** **No impact**.

| Threshold 4.10 (e) Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | ■ | |

### Impact Analysis

As discussed under Threshold 4.10 (a) and 4.10 (c), with implementation of the proposed drainage system improvements and features, the Project will not conflict with or obstruct implementation of the *Lahontan Basin Plan*. In addition, as discussed under Threshold 4.10 (b), the Project site is not subject to a Sustainable Groundwater Water Management program and will not substantially impede sustainable groundwater management of the basin

***Level of Significance:*** **Less than significant**.

## 4.11 Land Use And Planning

| Threshold 4.11 (a) | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Physically divide a community? | | | | ■ |

### Impact Analysis

An example of a Project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project

[29] California Department of Conservation, *California Official Tsunami Inundation Maps,* https://www.conservation.ca.gov/cgs/tsunami/maps#:~:text=Coordinated%20by%20Cal%20OES%2C%20California,considered%20tsunamis%20for%20each%20area., accessed April 25, 2021.

site is bordered on the north by vacant land, on the south by Seneca Road followed by residential development, on the east by residential development, and on the west by vacant land followed by Calendula Road. Given the location and surrounding land uses, the Project is a logical continuation of the development pattern in the area and will not divide an established community.

***Level of Significance:*** **No impact**.

| Threshold 4.11 (b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | | | ■ | |

### Impact Analysis

The applicable plans and policies relating to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect are evaluated throughout this Initial Study document as described below.

### City of Adelanto General Plan

- *Land Use Element:* The General Plan Land Use and Zoning designation for the Project site is R-1 (Single-Family Residential) which allows a maximum density of 4 dwellings per acre. The Project proposes a density of 3.6 du/ac, which is consistent with the General Plan Land Use Element.
- *Circulation Element:* Please refer to Section 4. 17, Transportation, for the analysis.
- *Conservation/Open Space Element:* Please refer to Sections 4.1, *Aesthetics*, and Section 4.4, *Biological Resources*, for the analysis
- *Noise Element:* Please refer to Section 4.13, *Noise,* for the analysis.
- *Safety Element:* Please refer to Section 4.9, *Hazards and Hazardous Materials,* for the analysis.
- *Community Design Element:* Please refer to Section 4.1, *Aesthetics,* for the analysis.

### City of Adelanto Zoning Ordinance

In instances where the Zoning Ordinance applies to an environmental effect, it is identified in the Analysis section for an environmental topic.

### Mojave Desert Air Quality Management District Air Quality Management Plan

Please refer to Section 4.3, *Air Quality*, for the analysis

**San Bernardino County Regional Greenhouse Gas Reduction Plan**

Please refer to section 4.8, *Greenhouse Gas Emissions,* for the analysis

**Water Quality Control Plan for the Lahontan Region (Basin Plan)**

Please refer to Section 4.10, *Hydrology and Water Quality* for the analysis.

### Conclusion

As demonstrated throughout this Initial Study document, the Project would not conflict with any applicable land use plan, policy, or regulation due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, with compliance with mandatory regulatory requirements or mitigation measures.

***Level of Significance:*** **Less than significant.**

## 4.12 Mineral Resources

| Threshold 4.12 (a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | | ■ |

### Impact Analysis

The naturally occurring mineral resources within the Planning Area include sand, gravel or stone deposits that are suitable as sources of concrete aggregate. The Project site that has been designated with a Mineral Land Classification of MRZ-3A, which is an area containing known mineral occurrences of undetermined mineral resource significance. This classification was based on a report by the California Department of Conservation, Division of Mines and Geology, entitled *Mineral Land Classification of Concrete Aggregate Resources in the Barstow - Victorville Area, San Bernardino County, California*. A review of the California Department of Conservation interactive web mapping indicates there is no active mines on the Project site[30]. In addition, a review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the Project site.[31]

[30] https://maps.conservation.ca.gov/mineralresources/, accessed on June17, 2021.

[31] California, State of. Department of Conservation. California Oil, Gas, and Geothermal Resources Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14, accessed on June 17, 2021.

Accordingly, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California.

***Level of Significance***: **No impact.**

| Threshold 4.12 (b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | | ■ |

### Impact Analysis

The Project site is not being used for mineral resource recovery. The Project site is designated as Single Family Residential (R-1). As such, the Project is not delineated on the General Plan, a specific plan, or other land use plan as a locally important mineral resource recovery site

***Level of Significance:*** **No impact**.

## 4.13 Noise

| Threshold 4.13 (a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project more than standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | ■ | |

### Impact Analysis

*Existing Ambient Noise Levels*

As dictated by CEQA, the focus of the noise analysis is focused on whether the Project causes a substantial temporary or permanent *increase* in ambient noise levels in the immediate vicinity of the Project site.

The Project site is vacant and currently does not generate noise. Based on the *Initial Study/Mitigated Declaration, City of Adelanto Tentative Tract Map (TTM No. 20401)* which is located on the south side of Seneca Road, adjacent to the Project site, the average ambient noise levels at the intersection of Stevens Road and Seneca Road were measured at 59.4 dBA[32].

*Short-term Construction Noise Impact Analysis*

The most significant source of short-term noise impact is related to noise generated during construction activities on the Project site. Construction is performed in discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. Thus, noise levels will fluctuate depending upon construction phase, equipment type, duration of equipment use, distance between the noise source and receptor, and the presence or absence of noise attenuation structures. As shown on Table 4.13.1, *Typical Construction Equipment Noise levels*, below, noise levels generated by heavy construction equipment can range from approximately 75 dBA to 99 dBA when measured at 50 feet.

**Table 4.13.1. Typical Construction Equipment Noise Levels**

| Type of Equipment | Range of Sound Levels Measured (dBA at 50 feet) |
|---|---|
| Pile Drivers | 81 to 96 |
| Rock Drills | 83 to 99 |
| Jack Hammers | 75 to 85 |
| Pneumatic Tools | 78 to 88 |
| Pumps | 68 to 80 |
| Dozers | 85 to 90 |
| Tractors | 77 to 82 |
| Front-End Loaders | 86 to 90 |
| Graders | 79 to 89 |
| Air Compressors | 76 to 86 |
| Trucks | 81 to 87 |
| *Source: "Noise Control for Buildings and Manufacturing Plants", Bolt, Beranek & Newman, 1987, as cited in the General Plan EIR* | |

[32] *Initial Study/Mitigated Declaration, City of Adelanto Tentative Tract Map (TTM No. 20401),* Blodgett Baylosis Environmental Planning, February 9, 2021, p.75.

Construction noise will have a temporary or periodic increase in the estimated 59.4 dBA ambient noise level above the existing within the Project vicinity. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Construction activities are expected to occur within approximately 100 feet of the single-family residences located along the eastern boundary of the Project site.

Noise levels will be loudest during the grading phase from the use of a bulldozer, which at 50 feet, ranges from 85 to 90 dBA. For every doubling of distance, the sound level reduces by 6 dBA. Thus, the noise levels at the residential uses located adjacent to the eastern Project boundary is forecast to range from 79 dBA to 84 dBA.

Noise generation related to construction activities is addressed in §17.90.020(d) of the Zoning Ordinance which requires construction projects to list general noise reduction practices as "General Notes" on the construction drawings as part of the Project's conditions of approval (COA). These mandatory conditions are described as follows:

***17.90.020 (d) Construction Practices***

*To reduce potential noise and air quality nuisances, the following items shall be listed as "General Notes" on the construction drawings:*

*(1) Construction activity and equipment maintenance is limited to the hours between 7:00 a.m. to dusk on weekdays. Construction may not occur on weekends or State holidays, without prior consent of the Building Official. Non-noise generating activities (e.g., interior painting) are not subject to these restrictions. City and State construction projects, such as road re-building or resurfacing, and any construction activity that is in response to an emergency, shall be exempt from this requirement.*

*(2) Stationary construction equipment that generates noise in excess of sixty-five (65) dBA at the project boundaries must be acoustically shielded and located at least one hundred feet (100') from occupied residences. The equipment area with appropriate acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities.*

*(3) Construction routes are limited to City of Adelanto designated truck routes.*

*(4) Water trucks or sprinkler systems shall be used during clearing, grading, earth moving, excavation, or transportation of cut or fill materials to prevent dust from leaving the site and to create a crust after each day's activities cease. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds fifteen (15) miles per hour.*

*(5) A person or persons shall be designated to monitor the dust control program and to order increased watering as necessary to prevent transport of dust off-site. The name and telephone number of such person(s) shall be provided to the City.*

*(6) All grading equipment shall be kept in good working order per factory specifications.*

With implementation of the above standard conditions of approval, construction noise impacts would be less than significant.

*Operational Noise Analysis*

Sound levels generated by single-family residential activities are:

- Normal conversation, air conditioner= 60 dBA
- Gas-powered lawnmowers and leaf blowers = 80-85 dBA.
- Motorcycle = 95 dBA
- Very loud radio, stereo, or television = 105–110 dBA
- Shouting or barking in the ear = 110 dBA[33]

The USEPA identifies noise levels affecting health and welfare as exposure levels over 70 dBA over a 24-hour period. Noise levels for various levels are identified according to the use of the area. Levels of 45 dbA are associated with indoor residential areas, hospitals, and schools, whereas 55 dBA is identified for outdoor areas where typical residential human activity takes place. According to the USEPA levels of 55 dbA outdoors and 45 dbA indoors are identified as levels of noise considered to permit spoken conversation and other activities such as sleeping, working, and recreation, which are part of the daily human condition.[34] Levels exceeding 55 dbA in a residential setting are normally short in duration and not significant in affecting health and welfare of residents.

The primary increase in noise will the result of adding vehicle traffic generated by the Project to Seneca Road. Roadway vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed Project does not propose any uses that would require a substantial number of truck trips and the proposed Project would not alter the speed limit on Seneca Road.

Under existing conditions, traffic volumes are relatively low (insert) along Seneca Road between Calendula Road and Aster Road. The Project is forecast generate 840 daily vehicle trips to the

[33] Center for Disease Control, "*Loud Noised Can Cause Hearing Loss*". ,https://www.cdc.gov/nceh/hearing_loss/default.html, accessed on July 24, 2021.
[34] USEPA "EPA Identifies Noise Levels Affecting Health and Welfare" https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.htmlaccessed July 26, 2021.

existing daily trips along the segment[35]. However, the City has approved two residential subdivisions located on the south side of Seneca Road across from the Project site.

- Tentative Tract Map No. 17250 will generate 1,293 daily vehicle trips.
- Tentative Tract Map No. 20401 will add 1,038 daily vehicle trips.

Combined, both subdivisions will generate 2,331 daily vehicle trips along Seneca Road in the immediate area. According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.[36] A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable.

Although the Project will add 840 daily vehicle trips along Seneca Road, the increase is 36% and does not result in a doubling (100%) of the daily vehicle traffic to be generated in the area. Therefore, the proposed Project traffic would not result in a substantial permanent increase in ambient roadway noise levels and noise impacts created by the Project would be less than significant and mitigation is not required.

### Conclusion

Through compliance with mandatory requirements to reduce noise during construction, the Project's construction noise impacts will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project. In addition, as shown above, the Project's operational noise would not be significant either.

***Level of Significance:*** **Less than significant**.

| **Threshold 4.13 (b). Would the Project:** | **Potentially Significant or Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| Generation of excessive ground borne vibration or groundborne noise levels? | | | ■ | |

### Impact Analysis

Ground-borne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. The Project does

[35] *TTM 20398, Single Family Residential Project Traffic Impact Study*, RK Engineering Group, Inc., July 7, 2021.
[36] Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

not involve the use of heavy trucks, so vehicle traffic generated by the Project will not generate excessive ground borne vibration.

According to the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018[37], while ground vibrations from construction activities do not often reach the levels that can damage structures, construction vibration may result in building damage or prolonged annoyance from activities such as blasting, piledriving, vibratory compaction, demolition, and drilling or excavation near sensitive structures. The Project does not require these types of construction activities.

***Level of Significance:*** **Less than significant**.

| Threshold 4.13 (c). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | ■ | |

## Impact Analysis

The nearest airport from the site is the Southern California Logistics Airport located approximately 5.9 miles to the northeast. According to the *Southern California Logistics Airport Comprehensive Land Use Plan,* Figure 2H, *Existing Noise Contours,* and Figure 2I, *Long Range Noise Contours*, the Project site is not located in an area impacted by aircraft noise. Therefore, the Project would not exacerbate an existing condition that exposes people residing or working in the project area to excessive noise levels.

***Level of Significance:*** **Less than significant impact.**

[37] https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123.

# 4.14 Population And Housing

| Threshold 4.14 (a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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)? | | | ■ | |

## Impact Analysis

The Project site has a General Plan Land Use and Zoning designation of Single Family Residential (R-1) which allows a maximum density of 4 dwellings unit per acre (du/ac). As proposed, the Project has a density of 3.6 du/ac and is therefore consistent with the General Plan. According to the 2020 population estimates provided by the California Department of Finance, there are 3.88 persons per households in Adelanto[38]. Based on 89 dwelling units, the Project could increase the overall population of the City by 345 persons (assuming all new residents will come from outside the city limits). The Project site is in a developing residential area of the City adjacent to existing residential development to the east and to the south of Seneca Road. Development of the Project is a logical extension of existing nearby development. In addition, the Project site is served by existing water and sewer facilities, gas and electric utilities, and roadways. No additional infrastructure will be needed to serve the Project other than connection to infrastructure adjacent to the site.

***Level of Significance:*** **Less than significant.**

| Threshold 4.14 (b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | ■ |

[38] E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark, https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/, accessed on July 24, 2021.

### Impact Analysis

The Project site consists of undeveloped vacant land. Therefore, implementation of the Project would not displace a substantial number of existing housing, nor would it necessitate the construction of replacement housing elsewhere.

***Level of Significance:*** **No impact**.

## 4.15 Public Services

| Threshold 4.15 (a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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: | | | | |
| 1) Fire protection? | | | ■ | |
| 2) Police protection? | | | ■ | |
| 3) Schools? | | | ■ | |
| 4) Parks? | | | ■ | |
| 5) Other public facilities? | | | ■ | |

Fire Protection: The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by the Adelanto Station #322, an existing station located approximately three (3) miles north of the Project site at 10370 Rancho Road. Development of the Project would impact fire protection services by placing an additional demand on existing County Fire Department resources should its resources not be augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access.

In addition, the City collects a Development Impact Fee to assist the City in providing fire protection facilities. Payment of the Development Impact Fee would be applied to fire facilities

and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project. Therefore, the Project would not result in the need to construct new or physically altered fire facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Police Protection: The San Bernardino County Sheriff's Department provides community policing to the Project area via the Victor Valley Sheriff Station located at 11613 Bartlett Street in Victorville. Because the Project site is in a developed area, it is routinely patrolled by the Sheriff's Department. The City collects a Development Impact Fee to assist the City in providing for capital improvement costs for police protection facilities. Payment of the Development Impact Fee would be applied to police facilities and/or equipment, to offset the incremental increase in the demand for police protection services that would be created by the Project. Therefore, the Project would not result in the need to construct new or physically altered police facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police protection.

Schools: Adelanto is served by two school districts: Adelanto Elementary School District, which provides elementary and middle School services throughout the City, and the Victor Valley Union High School District, which operates Adelanto High School. The closest schools to the Project site include Columbia Middle School, located approximately 1,460 feet to the east; Theodore Vick (Elementary) School, located 2,000 feet to the east, and Adelanto High School, located 1.06 miles to the southwest.

The Project is forecast to generate the following number of students as shown in Table 4.15.1, *Student Generation*.

**Table 4.15.1. Student Generation Factors for Single-Family Residential and Number of Students**

| School Level | Student Generation Factor (1) (2) | Number of Students |
|---|---|---|
| Elementary School | 0.3366 | 29.9 |
| Junior High School | 0.1041 | 9.26 |
| High School | 0.1439 | 12.8 |
| **Total** | **---** | **52** |

Notes:
1) Elementary and Junior High School generation rates are based upon the *Adelanto Elementary School District, School Facilities Justification Report, June 29, 2021.*

2) High School student rate is based upon the *Victor Valley Union High School District, Residential and Commercial/Industrial Development School Fee Justification Report, April 21, 2020.*

Both school districts are authorized by State law (Government Code § 65995-6) to levy a new construction fee per square foot of industrial construction for the purpose or funding the

reconstruction or construction of new school facilities. Pursuant to Section 65995(3) (h) of the California Government Code, the payment of statutory fees is "*deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities.*" Therefore, the payment of school impact fees for residential development would offset the potential impacts of increased student enrollment related to the implementation of the Project.

Parks: The nearest public park to the Project site is the John Mgrdichian Park Baseball Field which is located approximately 1 mile to the east. The City of Adelanto requires dedication of land, payment of fees in-lieu of parkland dedication, or a combination thereof at a rate of three acres of parkland per 1,000 residents for proposed residential subdivisions, pursuant to *Adelanto Municipal Code Chapter 16.52.* Based on 89 dwelling units, the Project could increase the overall population of the City by 345 persons (assuming all new residents will come from outside the city limits). 345 residents would result in the need of 0.26 acres of parkland. Payment of the in-lieu fee would ensure that the Project will not result in a significant impact with respect to parkland

Other Public Facilities: As noted above, development of the Project could result in a direct increase in the population of 345 persons. The current population of the City is 35,147 (assuming all new residents of the Project came from outside the City). As such, the Project would result in a 0.98% increase in population. It is not anticipated the Project would increase the demand for public services, including public health services and library services to the degree that the construction of new or expanded public facilities would be required based on this small increase in population.

In addition, the Project would be required to comply with the provisions of Municipal Code Chapter 3.75 which requires payment of the Development Impact Fee to assist the City in providing public services. Payment of the Development Impact Fee would ensure that the Project provides fair share of funds for additional public services. These funds may be applied to the acquisition and/or construction of public services and/or equipment.

# 4.16 Recreation

| Threshold 4.16 (a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | ■ | |

### Impact Analysis

The nearest public park to the Project site is the John Mgrdichian Park Baseball Field which is located approximately 1 mile to the east. The Project could result in the increased use of existing parks and recreation facilities. Substantial deterioration of existing facilities could occur if the level of usage intensifies significantly and the maintenance of affected facilities does not keep pace with intensified use and additional park facilities are not provided to meet existing and the increased demand.

As noted under Threshold 4.15 (a) above, development of the Project could result in an increase in population of 345 persons (0.98% increase). This small amount of population increase is not anticipated to increase the use of existing neighborhood and regional parks or other recreational facilities to the degree that substantial physical deterioration of recreational facilities would occur or be accelerated.

In addition, the City of Adelanto requires dedication of land, payment of fees in-lieu of parkland dedication, or a combination thereof at a rate of three acres of parkland per 1,000 residents for proposed residential subdivisions, pursuant to *Adelanto Municipal Code Chapter 16.52.* Compliance with this mandatory requirement will ensure that the Project will not result in a significant impact with respect to recreational facilities.

***Level of Significance:*** **Less than significant impact**.

| Threshold 4.16 (b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | | | | ■ |

### Impact Analysis

The Project does not propose the construction or expansion of recreational facilities.

***Level of Significance:*** **No impact**.

## 4.17 Transportation

The following analysis is based in part on the following technical report and plans*:*

*TTM 20398 Single Family Residential Project Traffic Impact Study,* RK Engineering Group, Inc., July 7, 2021, and is included as Appendix E to this Initial Study.

| Threshold 4.17(a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? | | | ■ | |

### Impact Analysis

Transit Facilities

Public transportation services within the City of Adelanto and near the proposed Project are provided by the Victor Valley Transit Authority (VVTA). The closet connection points to the VVTA transit routes are Route No. 31, located at the intersection of Seneca Road and Verbena Road approximately ½ mile to the east and Route No. 33, located at the intersection of Aster Road and Victor Street approximately ½ mile to the northeast. The Project is not proposing any improvements that would conflict with Route Nos. 31 and 33, or any future transit service in the area.

Roadway Facilities

As discussed in more detail under Threshold 4.17 (b) below, effective July 1, 2020, changes to the California Environmental Quality Act (CEQA) require Vehicle Miles Traveled (VMT) as the new metric for evaluating environmental impacts under CEQA as opposed to motorist delay and level of service (LOS). For development projects, VMT is simply the product of the daily trips generated by a new development and the distance those trips travel to their destinations. For CEQA purposes, roadway facilities are viewed in the context of how they reduce the amount of vehicle

miles traveled and promote the use of other non-motorized modes of travel such as transit, bicycle, and pedestrian.

The Project proposes the following roadway improvements:

- The north side of Seneca Road between Stevens Road and the eastern Project boundary, will be improved with pavement, curb, gutter, sidewalk, and a landscaped parkway within a 50-foot, half-width right-of-way. These improvements will match the improvements currently under construction on the south side of Seneca Road.

- The north side of Seneca Road between Stevens Road and the western Project boundary, will be improved with pavement, curb, gutter, sidewalk, and a landscaped parkway within a 50-foot, half-width right-of-way. There currently no roadway improvements under construction along the south side of this segment. However, TTM 20401 was recently approved by the City and the south side of Seneca Road will be improved when TTM 20401 develops.

- Proposed internal streets will be public roads improved with pavement, curb, gutter, sidewalk, driveway approaches, and landscaped parkway within a 60-foot, full-width right-of-way.

The above-described improvements will promote a reduction in VMT by constructing sidewalks to facilitate pedestrians and by improving roadway to allow access for transit service.

Bicycle and Pedestrian Facilities

In October 2020, the City adopted the *Adelanto Active Transportation Plan. Adelanto in Motion, An Active Transportation Plan* ("Plan") which represents a new commitment to walking and biking in Adelanto. Figure 4.17.1, *Recommended Bicycle Projects-South*, and Figure 4.17.2, *Recommended Pedestrian Projects-South*, show future bicycle and pedestrian projects proposed in the immediate vicinity of the Project site which will serve to reduce VMT.

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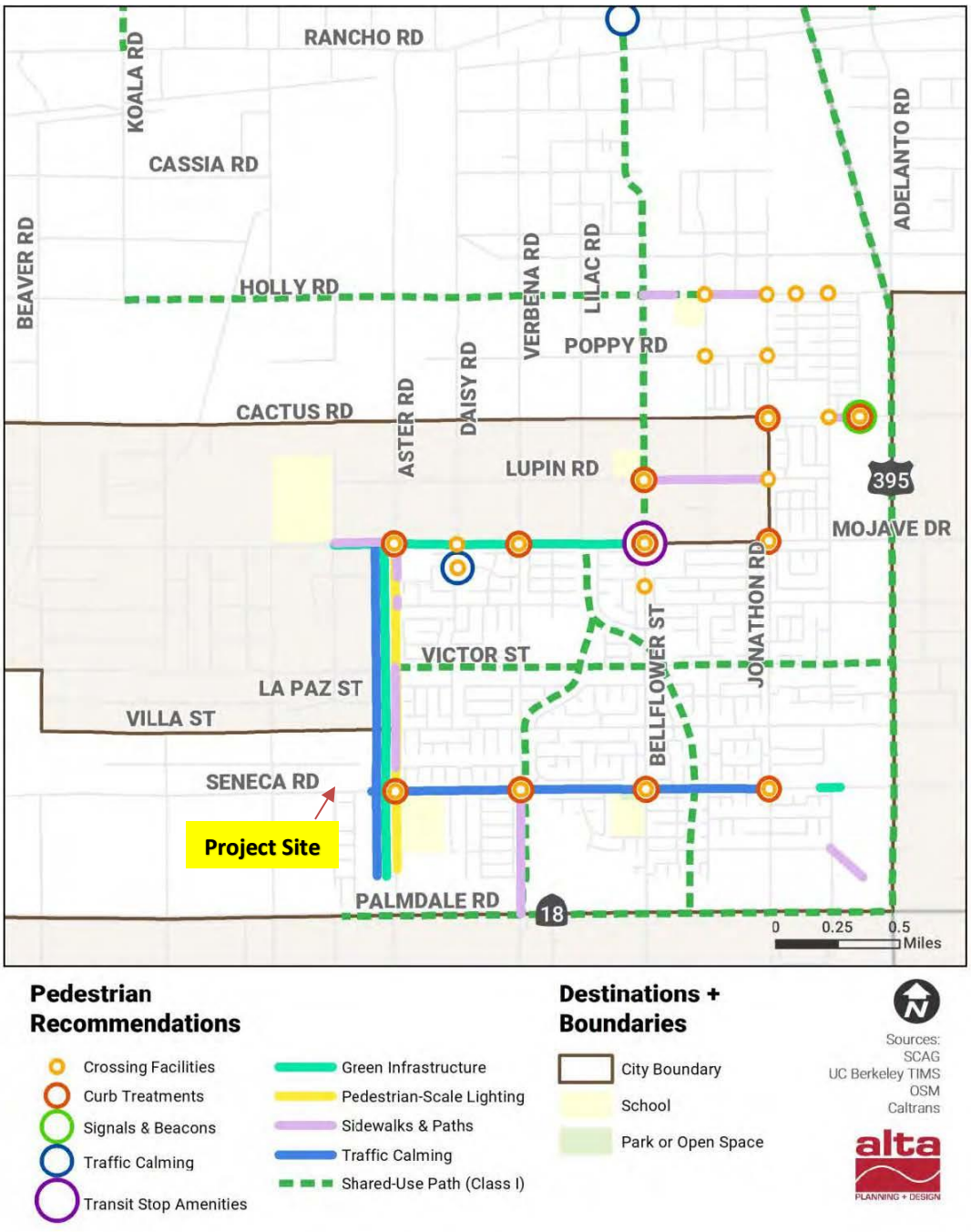
**Figure 4.17.1. Recommended Bicycle Projects-South[39]**


or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

[39] Figure 24- *Adelanto Active Transportation Plan. Adelanto in Motion, An Active Transportation Plan, October 2020.*

**Figure 4.17.2. Recommended Pedestrian Projects - South**[40]




[40] Figure 27- *Adelanto Active Transportation Plan. Adelanto in Motion, An Active Transportation Plan, October 2020.*

## Conclusion

Based on the preceding analysis, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

| Threshold 4.17(b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? | | | ■ | |

## Impact Analysis

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA.

The City of Adelanto City Council adopted Resolution No. 20-41 on June 24, 2020, which approved VMT thresholds for CEQA compliance related to transportation analysis. A project is considered to have a less than significant impact related to VMT if it is located in a low VMT generating model traffic analysis zones (TAZs). These TAZs generate total daily VMT/SP that is 15% less than the baseline level for the County.

Utilizing the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool, the proposed project is located within a low VMT generating area. As a result, the proposed Project is screened out based on Low VMT Area Screening, and may be presumed to have a less than significant impact on VMT under CEQA. Therefore, no further VMT analysis is required.

***Level of Significance:*** **Less than significant**.

| Threshold 4.17( b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | ■ | |

### Impact Analysis

The proposed roadway improvement will be designed in accordance with the City of Adelanto's *Standard Drawings and Specifications* requirements. In addition, the Project is located in an area developed with residential uses. As such, the Project would not be incompatible with existing development in the surrounding area to the extent that it would create a transportation hazard because of an incompatible use.

***Level of Significance:*** **Less than significant**.

| Threshold 4.17(b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in inadequate emergency access? | | ■ | | |

### Impact Analysis

The Project would improve Seneca Road adjacent to the Project site per City standards. Two access points onto Seneca Road are proposed that would be public streets designed to City standards. Emergency access would be from Seneca Road and Aster Road connecting to the citywide circulation system. During the course of the preliminary review of the Project, the Project's transportation design was reviewed by the City's Engineering Department, Fire Department, and Sheriff's Department to ensure that adequate access to and from the site would be provided for emergency vehicles.

***Level of Significance:*** **Less than significant**.

# 4.18 Tribal Cultural Resources

§21074 of the Public Resources Code describes Tribal Cultural Resources as follows:

*(a) "Tribal cultural resources" are either of the following:*

*(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*

*(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.*

*(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*

*(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

*(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*

*(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).*

| **Threshold 4.18 (a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:** | **Potentially Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| 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)? | | | | ■ |

## Impact Analysis

A historical resource or archaeological resource may also be a tribal cultural resource if it conforms with the criteria described in Public Resources §21084 (a) above. As discussed in Section 4.5 *Cultural Resources*, based on a pedestrian field survey, no historic or archaeological resources were encountered on the Project site. However, grading, utility trenching, and the construction of the water quality basin have the potential to reveal buried deposits at greater depths. Therefore, Mitigation Measures CR-1 and CR-2 under Section 4.5, Cultural Resources shall apply.

***Level of Significance:*** **Less than significant impact with mitigation incorporated.**

| **Threshold 5.18 (b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:** | **Potentially Significant Impact** | **Less than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | | ■ | | |

The provisions in the Public Resources Code related to tribal cultural resources created a process for consultation with California Native American Tribes during the CEQA process. Tribal Governments can request consultation with a lead agency and give input into potential impacts to tribal cultural resources before the agency decides what kind of environmental assessment is appropriate for a proposed project. The City commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to Public Resources Code section 21080.3.1. The Project site is located within Serrano ancestral territory and, therefore, is of interest to the San Manuel Band of Mission Indians (SMBMI). As a result, Mitigation Measures TCR-1 through TCR-5 are made a part of the project/permit/plan conditions.

***Mitigation Measure TCR-1. Inadvertent Discovery****. If 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 TCR-~~1~~4, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.*

***Mitigation Measure TCR-2. Monitoring and Treatment Plan.*** *If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-~~1~~4. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.*

***Mitigation Measure TCR-3. Human Remains.*** *If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.*

***Mitigation Measure TCR-4. Pre-Contact Historic Cultural Resources.*** *The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in Mitigation Measure TCR-1 and TCR-2, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, 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.*

***Mitigation Measure TCR-5. Documents.*** *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.*

***Level of Significance***: With implementation of Mitigation Measures TCR-1 through TCR-5, impacts are **Less than significant**.

# 4.19 Utilities And Service Systems

| Threshold 4.19 (a). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | ■ | | |

## Impact Analysis

The Project does not require that the existing utility infrastructure be relocated as the Project will connect to the existing infrastructure facilities adjacent to the Project site. However, the installation and construction of the sewer, water, storm drainage facilities described below will result in earth moving that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources.

### Water Service

The Project will connect to the existing waterline located in Seneca Road adjacent to the Project site.

### Sewer Service

The Project will connect to the existing sewer line located in Seneca Road adjacent to the Project site.

### *Storm Drainage Improvements*

The primary hydraulic design elements are the roads and the storm drain. Roads within the project will be used to carry runoff to a proposed water quality basin designed for both retention and detention before discharging to the existing storm water drainage course located in proposed LOT B.

### *Electric Power Facilities*

The Project will connect to the existing Southern California Edison electrical distribution facilities available in the vicinity of the Project site.

*Natural Gas Facilities*

The Project will connect to the existing Southwest Gas Corporation natural gas distribution facilities available in the vicinity of the Project site.

*Telecommunication Facilities*

Telecommunication facilities include a fixed, mobile, or transportable structure, including, all installed electrical and electronic wiring, cabling, and equipment, all supporting structures, such as utility, ground network, and electrical supporting structures, and a transmission pathway and associated equipment in order to provide cable TV, internet, telephone, and wireless telephone services to the Project site. Services that are not provided via satellite will connect to existing facilities maintained by the various service providers.

## Conclusion

Construction or installation of utilities and service systems may impact Biological Resources, Cultural Resources, Paleontological Resources, and Tribal Cultural Resources. Mitigation Measures BIO-1, BIO-2, CR-1, CR-1, GEO-1, GEO-2, and TCR-1 through TCR-5 are required.

***Level of Significance***: With the implementation the mitigation measures identified above, impacts are **less than significant**.

| Threshold 4.19 (b). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple years? | | | ■ | |

## Impact Analysis

The Project would be served with potable water by the Adelanto Public Utility Authority. The City's 2015 Urban Water Management Plan indicates the gallons per capita water use at 109 gallons per day per person (GPCD)[34]. The project is estimated to increase the population by approximately 345 persons which would create an additional water demand of 42.12-acre feet per year.

[34] *Adelanto 2015 Urban Water Management Plan*, June 6, 2016, p. 23, accessed on May 31, 2021

Adelanto has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.[35] The Mojave Basin Area was the subject of a court ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. The court ordered adjudication of the Mojave Basin Area allocates a variable Free Production Allowance (FPA) to each purveyor that supplies more than 10 AFY, including Adelanto.

Each allocated FPA represents the purveyor's share of the water supply available from the MWA Subarea. FPAs are determined as a percentage of the purveyor's highest verified annual use from 1986 to 1990. The FPA, which is currently set at 80 percent of the Base Annual Production (BAP) for agriculture and 60 percent of BAP for municipal and industrial and industrial producers, can vary from year to year depending on the Watermaster's safe yield projections for the Basin. If Adelanto, or another purveyor, pumps more than its allotted FPA in any year, they are required to purchase replacement water equal to the amount of production in excess of the FPA. Replacement obligations are satisfied by paying MWA and then purchasing unused FPA within the subarea.

Pursuant to paragraph 24 (o) of the Judgment After Trial dated January 10, 1996, the Watermaster is required to make a recommendation to the Court for adjusting the FPA of each Subarea, if necessary. The City is located within the Alto Subarea. Based on the most recent (2021) annual report, the FPA in the Alto Subarea is within 5% of the Projected Safe Yield (PSY) of BAP (1.3%). Municipal and Industrial producers' FPA is within 5% of the indicated PSY at the current level of 55%. However, it is recommended that Agricultural producers FPA be reduced by 5% to 60% for Water Year 2021-22. Municipal and industrial producers FPA will remain at 55% for Water Year 2021-22. As noted above, FPA is within 5% (percentage of BAP) of PSY and thus, the Watermaster not compelled to recommend ramp down.[36]

***Level of Significance***: **Less than significant**.

[35] *Adelanto 2015 Urban Water Management Plan*, June 6, 2016, p. 23.

[36] Mojave Area Basin Watermaster, Watermaster Annual Report for Water Year 2019-20, May 1, 2021, available at: https://www.mojavewater.org/files/27AR1920.pdf, accessed on July 25, 2021.

| Threshold 4.19 (c). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | ■ | |

### Impact Analysis

The Adelanto Public Utilities Authority is the sole agency for collecting, treating and discharging wastewater within its service area through the Adelanto Wastewater Treatment Facility. Wastewater from Adelanto's water service area is collected and treated at the City-owned 4.0 MGD activated sludge wastewater treatment facility through an operations and maintenance contract with the PERC Water Corporation.

Municipal wastewater is generated in Adelanto's service area from a combination of residential, commercial, and industrial sources. The quantities of wastewater generated are generally proportional to the population and water usage in the service area. It is estimated that Adelanto's customers generate wastewater roughly proportional to 60 to 70 percent of the City's water demand. Based on the 70% wastewater to water calculation the Project is estimated to generate 24,000 gallons or 0.03 MGD of wastewater per day.

With the recent expansion of the Adelanto Wastewater Treatment Facility to 4.0 MGD, the City would have adequate capacity to serve the Project's wastewater needs and would not significantly impact existing commitments. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

***Level of Significance***: **Less than significant.**

| Threshold 4.19 (d). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Generate solid waste more than State or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | | | ■ | |

## Impact Analysis

### *Construction Related Impacts*

The California Green Building Standards Code ("CAL Green'), requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods. The City of Victorville Building and Safety Department reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CAL Green solid waste requirements

### *Operational Related Impacts*

The Project is estimated to generate 105 tons of solid waste per year[37][43]. The amount of estimated solid waste generated by the Project is derived from the California Emissions Estimator Model, which is s a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model also quantifies the amount of solid waste generated by a project. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses.

Although, solid waste may ultimately be disposed of at various landfills, the closest landfill to the Project site is the Victorville Sanitary Landfill located at 18600 Stoddard Wells Road, approximately 10 miles to the northeast. According the CalRecycle website, the Victorville Sanitary Landfill has a daily throughput of 3,000 tons per day and a remaining capacity of 93,400,000 cubic yards. The expected closure is October 1, 2047.[38] As such, there is adequate landfill capacity to serve the Project.

***Level of Significance*: Less than significant**.

| Threshold 4.19 (e). Would the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | ■ | |

[37] Appendix A-*Air Quality and Greenhouse Gas Emissions Study*.

[38] https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652, accessed on April 26, 2021.

### Impact Analysis

Avco Disposal (Burrtec), currently provides solid waste collection services to the City. Avco is required to provide these services in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

***Level of Significance***: **Less than significant**.

## 4.20 Wildfire

| Threshold 4.20 (e). Wildfire. | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Is the project located in or near state responsibility areas or lands classified as very high fire hazard severity zones? | | | | ■ |

### Impact Analysis

A wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. As stated in the State of California's General Plan Guidelines: "*California's increasing population and expansion of development into previously undeveloped areas is creating more 'wildland-urban interface' issues with a corresponding increased risk of loss to human life, natural resources, and economic assets associated with wildland fires*." To address this issue, the state passed Senate Bill 1241 to require that General Plan Safety Elements address the fire severity risks in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs).

According to the *California Fire Hazard Severity Zone Viewer* maintained by Cal Fire, the Project site is not located within a high wildfire hazard area[39][45]. Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, Thresholds 4.20 (a) through 4.20 (d) below require no response.

- □ Substantially impair an adopted emergency response plan or emergency evacuation plan.

- □ 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.

[39]https://egis.fire.ca.gov/FHSZ/, accessed on July 25, 2021.

- □ 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.

- □ Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes.

***Level of Significance:*** **Less than significant**.

# 4.21 Mandatory Findings Of Significance

| Threshold 4.21(a) Does the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Have the potential to 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, 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? | | ■ | | |

### Impact Analysis

As indicated in this Initial Study, biological resources, cultural resources, and tribal cultural resources may be adversely impacted by Project development. The following mitigation measures are required to reduce impacts to less than significant levels:

BIO-1. Burrowing Owl Pre-Construction Survey, BIO-2. Burrowing Owl Avoidance/Relocation, BIO-3. Mojave Ground Squirrel Pre-Construction Survey, BIO-4. Desert Tortoise Pre-Construction Survey, BIO-5. Nesting Bird Pre-Construction Survey, BIO-6. Compensatory Mitigation for Jurisdictional Waters, CR-1: Archaeological Inadvertent Discovery, and CR-2: Archeological Treatment Plan.

***Level of Significance:*** With implementation of the above-described mitigation measures impacts are **less than significant**.

| Threshold 4.21 (b) Does the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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 cumulative impacts analysis provided here is consistent with Section 15130(a) of the CEQA Guidelines in which the analysis of cumulative effects of a project is based on two determinations: Is the combined impact of this project and other projects significant? If so, is the project's incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant? The cumulative impact must be analyzed only if the combined impact is significant and the project's incremental effect is found to be cumulatively considerable (CEQA Guidelines 15130(a)(2) and (3)).

The analysis of potential environmental impacts in Section 4.0, *Environmental Analysis*, of this Initial Study concluded that the Project would have *no impact* or a *less than significant impact* for all environmental topics, with the exception of Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), Tribal Cultural Resources, and Utilities and Service Systems (installation of facilities that involves disturbance of previously undisturbed land). For these resources, Mitigation Measures are required to reduce impacts to less than significant levels as discussed below.

### *Biological Resources*

As discussed in Section 4.3, *Biological Resources,* of this Initial Study, future development of the site will impact the general biological resources present on the site, and most of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. More mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts.

Although wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service were not detected, the project site is located within the range of the Burrowing Owl, Mojave Ground Squirrel, Desert Tortoise, and Nesting Birds. Therefore, the Mitigation Measures BIO-1 through BIO-6 have been included to ensure any impacts are less than significant to these species

Overall, the loss of about 25-acre of disturbed desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding desert region. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

### *Cultural Resources*

As discussed in Section 4.3, *Cultural Resources,* of this Initial Study, the records search and field survey did not identify any cultural resources, including historic and prehistoric sites or historic-period buildings within the project site boundaries. Research results, combined with surface conditions have failed to indicate sensitivity for buried cultural resources. No additional cultural resources work or monitoring is necessary during proposed activities associated with the development of the earthmoving activities. If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary as required by Mitigation Measure CR-1 and CR-2. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

### *Geology and Soils (Paleontological Resources)*

As discussed in Section 4.7, *Geology and Soils,* of this Initial Study, the property is situated in the Mojave Desert geomorphic province. The Mojave Desert province is a wedge-shaped area that is enclosed on the southwest by the San Andreas fault zone, the Transverse Ranges province and the Colorado Desert province, on the north and northeast by the Garlock fault zone, the Tehachapi Mountains and the Basin and Range province, and on the east by the Nevada and Arizona state lines, and the Colorado River. The area is dominated by broad alluviated basins that are mostly aggrading surfaces that are receiving non-marine continental deposits from the adjacent upland areas. More specific to the subject property, the site is located in an area geologically mapped to be underlain by alluvium. Alluvium has the potential to contain paleontological resources. Therefore, Mitigation Measure GEO-1 is required. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

### *Tribal Cultural Resources*

As discussed in Section 4.18, *Tribal Cultural Resources*, of this Initial Study, construction and operation of the Project could potentially impact tribal cultural resources. As a result of the AB52 tribal consultation process, Mitigation Measures TCR-1 through TCR-5 are required. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

### *Utilities and Service Systems*

As discussed in Section 4.16 *Utilities and Service Systems*, of this Initial Study, the installation and construction of the sewer, water, storm drainage facilities described below will result in earth moving that may impact Biological Resources, Cultural Resources, Geology and Soils

(Paleontological Resources), and Tribal Cultural Resources. Potential impacts to these resources are mitigated by Mitigation Measures BIO-1, CR-1 and CR-2, GEO-1, and TCR-1 through TCR-6. Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

***Level of Significance:*** **Less than significant**.

| Threshold 4.21 (c) Does the Project: | Potentially Significant or Significant Impact | Less than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | | | ■ | |

As indicated by this Initial Study, the Project will not result in potentially significant environmental impacts that directly affect human beings (i.e., air quality, agriculture and forestry resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, recreation, transportation, and utilities and service systems.

***Level of Significance:*** **Less than significant.**