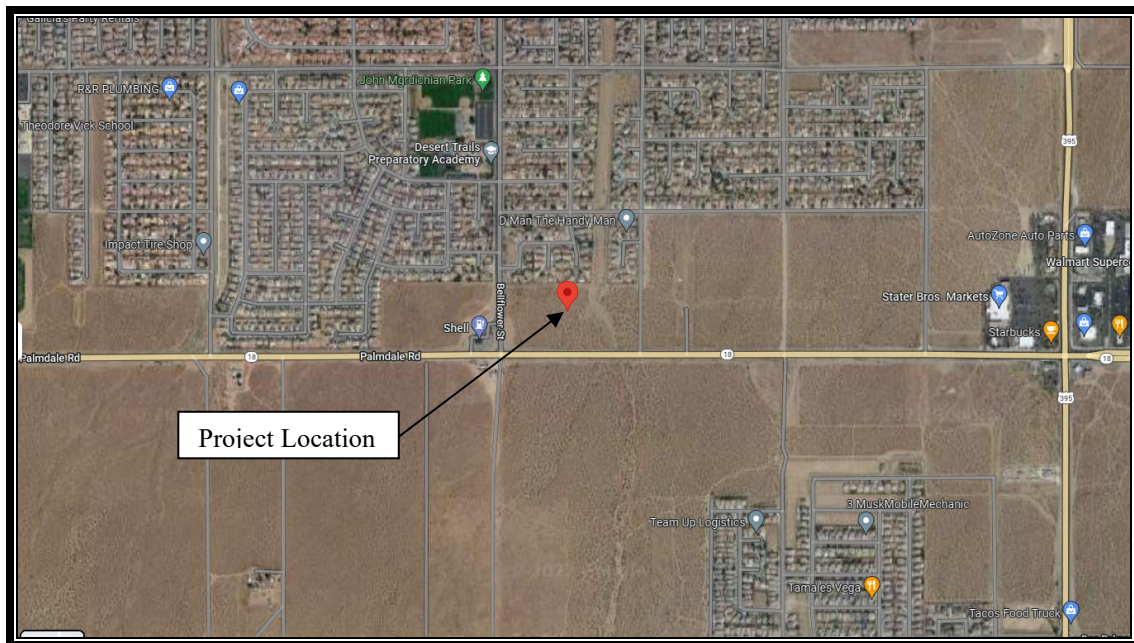


Public Review Draft
CEQA INITIAL STUDY AND MITIGATED NEGATIVE
DECLARATION

AT&T New Tower
Palmdale Road at Bellflower Street
Adelanto, San Bernardino County, CA 92301

CSL05972, Guru
FA#: 13025526, PACE#: MRLOS079069, USID#: 309836

CUP 22-01, LDP 22-01
SCH# pending



Prepared By:
Impact 7G, Environmental Consultant to AT&T Wireless
Mission Viejo, California 92692

Prepared For:



September 19, 2022



Foreword

Pursuant to the provisions of California Public Resources Code §21082.1, the City of Adelanto has directly managed the preparation of and independently reviewed and analyzed the information contained in this Initial Study and Mitigated Negative Declaration. The entire document including discussions, environmental analysis, conclusions, and proposed mitigation measures contained herein reflects the independent judgment of the City of Adelanto as to those issues at the time of publication.

Public Review Draft



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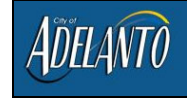


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1.0 Introduction

1.1 Objectives

The objective of this Initial Study and Mitigated Negative Declaration (MND) is to determine if there are significant adverse environmental impacts associated with the planning and implementation of installing a new AT&T Mobility tower located north of Palmdale Road (Highway 18) and east of Bellflower Street in the City of Adelanto, San Bernardino County, California. The recommendation of appropriate mitigation measures, as necessary, will reduce environmental impacts to less than significant levels. The Introduction portion of this Initial Study and MND sets forth the necessary environmental procedures per CEQA (California Environmental Quality Act).

1.2 Incorporation by Reference

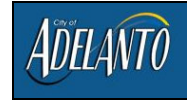
Certain documents are incorporated by reference into this environmental document pursuant to CEQA Guidelines §15150. Where a document is referenced, its pertinent sections will be briefly summarized in the discussions in this environmental report. These documents are also identified in the Initial Study Environmental Checklist of this CEQA document.

Chapter 17 of the City of Adelanto Municipal Codes, Special Use Standards for Antennas and Cellular Telephone Tower, 17.80.020(e)(3&4)A.5, -B and -C, requires new towers to be stealthed and subject to the maximum height of the subject zoning on the property, or can demonstrate why a higher height is necessary. The Project complies with these code requirements.

1.3 Environmental Procedures

The Initial Study Checklist and Mitigated Negative Declaration has been prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), as amended (Public Resources Code, Section 21000, et seq.) and the State Guidelines for Implementation of the California Environmental Quality Act of 1970 (California Code of Regulations, Title 14, Section 15000, et seq.), and as amended. This report also complies with the rules, regulations, and procedures for implementation of the California Environmental Quality Act adopted by the City of Adelanto, California. It was prepared by Impact 7G, a professional environmental consulting firm. The City of Adelanto is the Lead Agent for the project as defined by Section 21067 of CEQA. This Initial Study and MND was prepared under the direction of City staff and represents their independent judgment.

Pursuant to the City's guidelines to implement CEQA, an environmental checklist was prepared by Impact 7G on August 2, 2022, as part of an Initial Study (IS) for this project. The Initial Study Checklist concluded that this project would not have a significant effect on the environment with mitigation incorporated. Environmental issues as identified by the Initial



Study, and consistent with the California Environmental Quality Act, are analyzed in this MND. A copy of the Initial Study and its determinations are included with this MND.

1.4 Findings

Implementation of the project is part of the greater effort to provide cell phone and emergency coverage for the residents in this area of Adelanto. Pursuant to the California Environmental Quality Act, the City of Adelanto has determined that the proposed project will not have a significant effect on the environment. The attached initial study and MND documents the reasons supporting this finding.

AT&T Wireless has retained a consulting engineer to prepare the design of the project, (Bechtel Communications). This Initial Study and MND is based on the design selected by, and prepared for, AT&T Wireless. The Initial Study/MND for the project is available at the City of Adelanto Development Services, Planning Division, 11600 Air Expressway, Adelanto, California, 92301. The Initial study was conducted by Impact 7G on August 1, 2022. Any person may file comments on the Initial Study/MND. This must be done in writing, stating specific environmental reasons, within 30 days of the posted date and should be delivered to the City of Adelanto, Development Services.

1.5 Project Sponsors and Contact Persons

The City of Adelanto is the lead agency for preparation of this Initial Study/MND. The following agencies, organizations and individuals are associated with this project in the capacities indicated:

Lead Agency:

City of Adelanto, Development Services, Planning Division
11600 Air Expressway
Adelanto, CA 92301
Mr. James Hursh
760-246-2300

Project Applicant:

AT&T Mobility Services
1452 Edinger Avenue, 3rd Floor
Tustin, CA 92780

Coastal Business Group (Site Acquisition)
Crystal Rodrigues-Maramba
949-336-1550



CEQA Environmental Consultants:

Impact 7G, Inc.

Naida Flores, Project Manager
8951 Windsor Parkway
Johnston, Iowa 50131

Impact 7G

Sandra Jacobs, Environmental Professional
Mission Viejo, CA 92692
949-702-1145

Ace Environmental Inc.

Cultural Resource Research and Field Survey
Kerry N. Willoughby, CEM
9976 Peak Lookout Street
Las Vegas, Nevada 89178
702-614-4431

Ace Environmental Inc.

General Biological Evaluation
Kerry N. Willoughby, CEM
9976 Peak Lookout Street
Las Vegas, Nevada 89178
702-614-4431

Kidd Biological, Inc.

Nina Kidd, Wildlife biologist
Laguna Hills, CA
949-632-2756

Ace Environmental Inc.

National Environmental Protection Act Report
Kerry N. Willoughby, CEM
9976 Peak Lookout Street
Las Vegas, Nevada 89178
702-614-4431

Engineering Consultants:

Bechtel Communications

Ron Vanderwal
714-343-0931



DCI Pacific
Architecture/Engineering/Consulting
26 Executive Park, Suite 170
Irvine, CA 92614

Property Owner:
Guru Investments LLC
11305 Palmdale Road
Adelanto CA92301
Kaushik (Kevin) Patel
951-316-9924

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2.0 Project Description

2.1 Overview

The City of Adelanto requires approval of this Initial Study and MND, pursuant to the California Environmental Quality Act for the AT&T Wireless project located north of Palmdale Road (Highway 18) and east of Bellflower Street in the City of Adelanto, San Bernardino County, California. The new AT&T facility is commonly called CSL05972. A detailed project description is provided below.

2.2 Project Location

The undeveloped property is currently owned by Guru Investments, LLC and is identified by Assessor Parcel Number (APN) 3103-481-05-0000 with a total area of approximately 9 acres (henceforth called “Parent Property”). The proposed AT&T mono-eucalyptus and equipment will be located approximately 290 feet south from the property line to the closest residential area, approximately 600 feet east of Bellflower Street, and approximately 305 feet north of Palmdale Road, in the City of Adelanto, San Bernardino County, California (Project Site). Bellflower Street is a north-south trending road and intersects with east-west trending Palmdale Road to the south. Delicious Road and Highway 395 are located further to the east. The Project Site will be located along the eastern boundary of the parent property (latitude: N34.507805 degrees, longitude: W-117.414900 degrees). The San Bernardino and San Gabriel Mountains are to the south, and the Mojave River is to the east. The project is located in Section 21 of Township 5 North, Range 5 West (San Bernardino Baseline Meridian) as shown on the Adelanto, California USGS 7.5-minute quadrangle topographic map with an elevation of approximately 3,147 feet above mean sea level. The property has a Zoning designation of Commercial.

2.3 Detailed Project Description

Equipment

The project scope is to construct one (1) seventy-five-foot (75’) high mono-eucalyptus with a twenty-six foot (26’) diameter branch span, within a twenty foot, two inch (20’-2”) by thirty-six foot, two inch (36’-2”) lease area (730 square feet), surrounded by a new ten foot, eight inch (10’-8”) tall CMU wall enclosure with metal security lid (henceforth called “lease area”). Within the enclosure, AT&T will install one CWIC shelter, utility H-frame with telco panels and fused disconnects, and one 140-gallon backup diesel generator. A metal gate will access the equipment inside the enclosure. Other GPS antenna, electrical panels and meters will also be installed within the enclosure. The area will henceforth be referred to as the Project Site.

Access/trenching

Access to the proposed site is via a twelve foot (12’) wide by approximately six hundred-sixty feet (660’) non-exclusive vehicular path which will have a gravel base. The access will enter from Bellflower Street to the west. Approximately nine hundred thirty-five feet (935’) of



electrical and telco trenching will be required from the proposed site westward toward Bellflower Street, then southerly toward Palmdale Road and an existing SCE vault. The trenching will follow the proposed access path. The access area will also include a hammerhead turn around and non-exclusive parking space for maintenance parking.

Construction

Construction access is also proposed from Bellflower Street. A short-term impact of this project will likely be the inconveniences created for short periods of time on traffic flows along Bellflower Street. Construction is estimated to take 6 to 8 weeks, but not continuous during that time. Construction staging for the new mono-eucalyptus will be required. Construction personal vehicles will park on Bellflower Street. Semi-trucks carrying the mono-eucalyptus and equipment will enter and exit from Bellflower Street and will be required to remain within the proposed AT&T access easement. Spoils from the mono-eucalyptus caisson will temporarily be placed adjacent to proposed site and trucked off-site and disposed of by the construction contractor. Dump trucks and concrete trucks will be required to utilize the proposed access easement. Caisson spoils will not remain onsite. Construction will require a crane to place the mono-eucalyptus. The temporary impacts from construction will be restored after construction is complete. Joshua trees located on the property will be avoided.

2.4 Existing Setting and Surrounding Areas

The 9-acres parent property is primarily undeveloped level land, with the exception of some graded portions of the property along Bellflower Street and Palmdale Road, and off-road vehicle and pedestrian paths. The property also contains trash and various amounts and debris. The Project Site and trench locations include native vegetation of Creostote Brush as well as non-native forbs and grasses. Drainage is generally toward the east and north, toward the existing drainage to the east. At least two (2) Joshua Trees appear to be located very near the access and trench routes. The closest Joshua Tree to the lease is approximately 200 feet west.

The Project area, located in the high desert - southwest portion of the Mojave Desert, has an arid climate characterized by cool winters and hot summers. With an average annual temperature typically of approximately 62 °F, highs in the summer average 96 °F and lows in the winter averaging 33 °F, and low humidity throughout the year. Average annual precipitation for the Adelanto, California, area is approximately 3.9 inches.

Surrounding areas include:

- North: The property approximately 290 feet to the north of the AT&T facility consists of single-family residential uses. Additional residential uses to the northeast and northwest.
- South: Palmdale Road. Property to the south consists of vacant, undeveloped land similar to the Parent Property. The City of Victorville is located south of Palmdale Road.



East: Property to the east consists of vacant, undeveloped land similar to the Parent Property.

West: Bellflower Street. Property to the west includes a commercial gas station and additional vacant and undeveloped land.

Bellflower Street is a two laned local street trending north-south in this area, with no curb, gutter or sidewalk in the area of the subject property. Further north on Bellflower are single family homes (approximately 290 feet from the proposed AT&T facility), and the street is improved with curb, gutter and sidewalk, overhead street lighting and underground utilities, sewer and water. This area of Bellflower Street has mature landscaping and landscape irrigation.

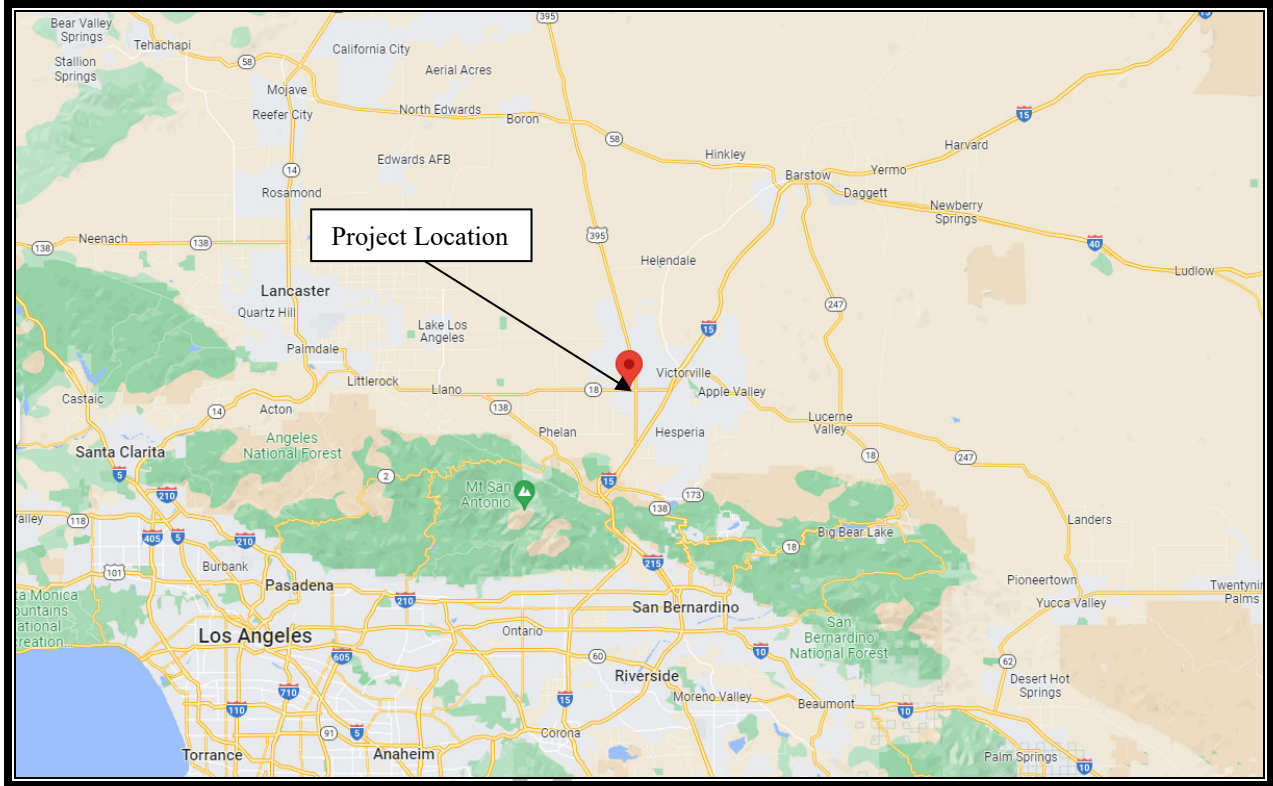
Palmdale Road (Highway 18) is a two-laned major arterial tending east-west in this area, with left and right turn lanes onto Bellflower Street. Curb, gutter and sidewalks are only located along the commercial gas station area of Palmdale Road. This area of Palmdale Road includes overhead power and telephone lines, street signage, and underground utilities.

2.5 Project Alternatives

Based on the information provided by the AT&T Wireless RF engineers, this location provides the optimum coverage. Therefore, no other alternatives were proposed.

2.6 Approvals Required as Necessary

- Compliance with the California Environmental Quality Act (CEQA).
- Compliance with City Conditional Use Permit.
- Encroachment Permit for any work within Palmdale Road.
- MDAQMD Permit for backup generator.

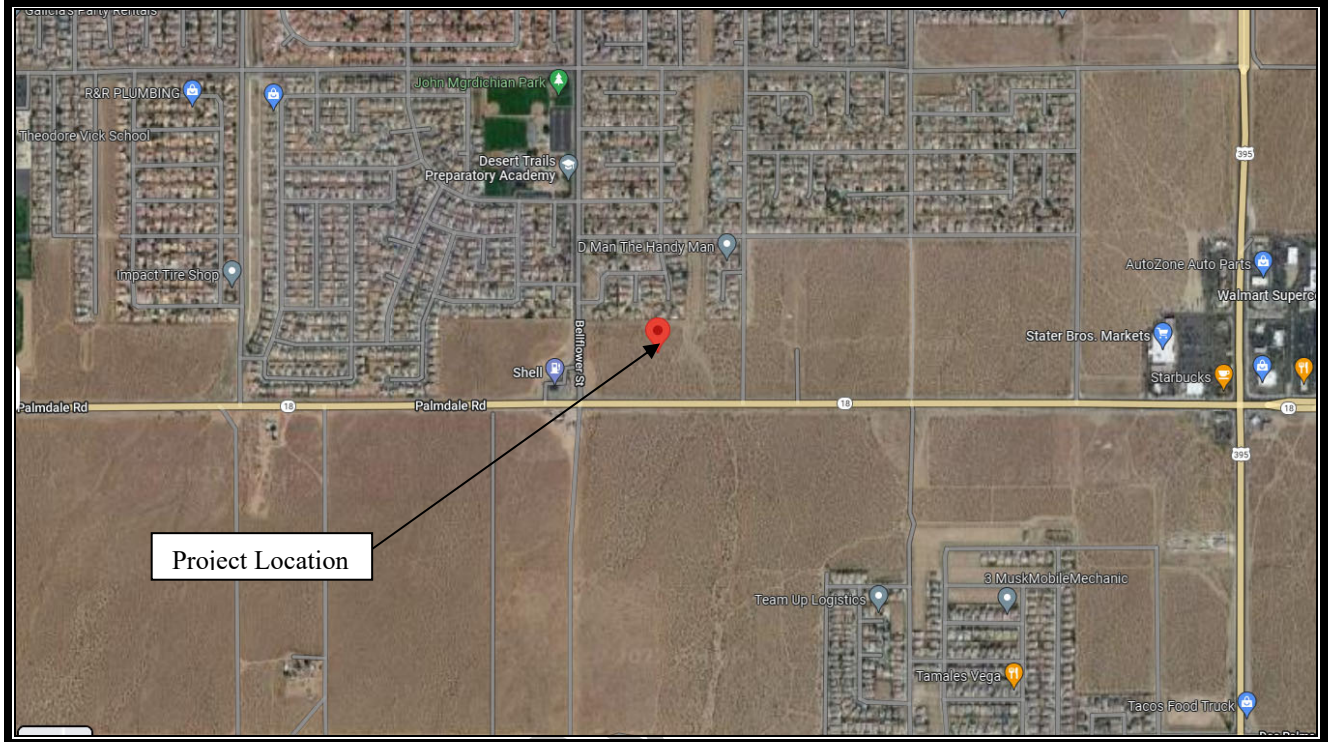


Source: Google Maps

Regional Location Map



Public Review

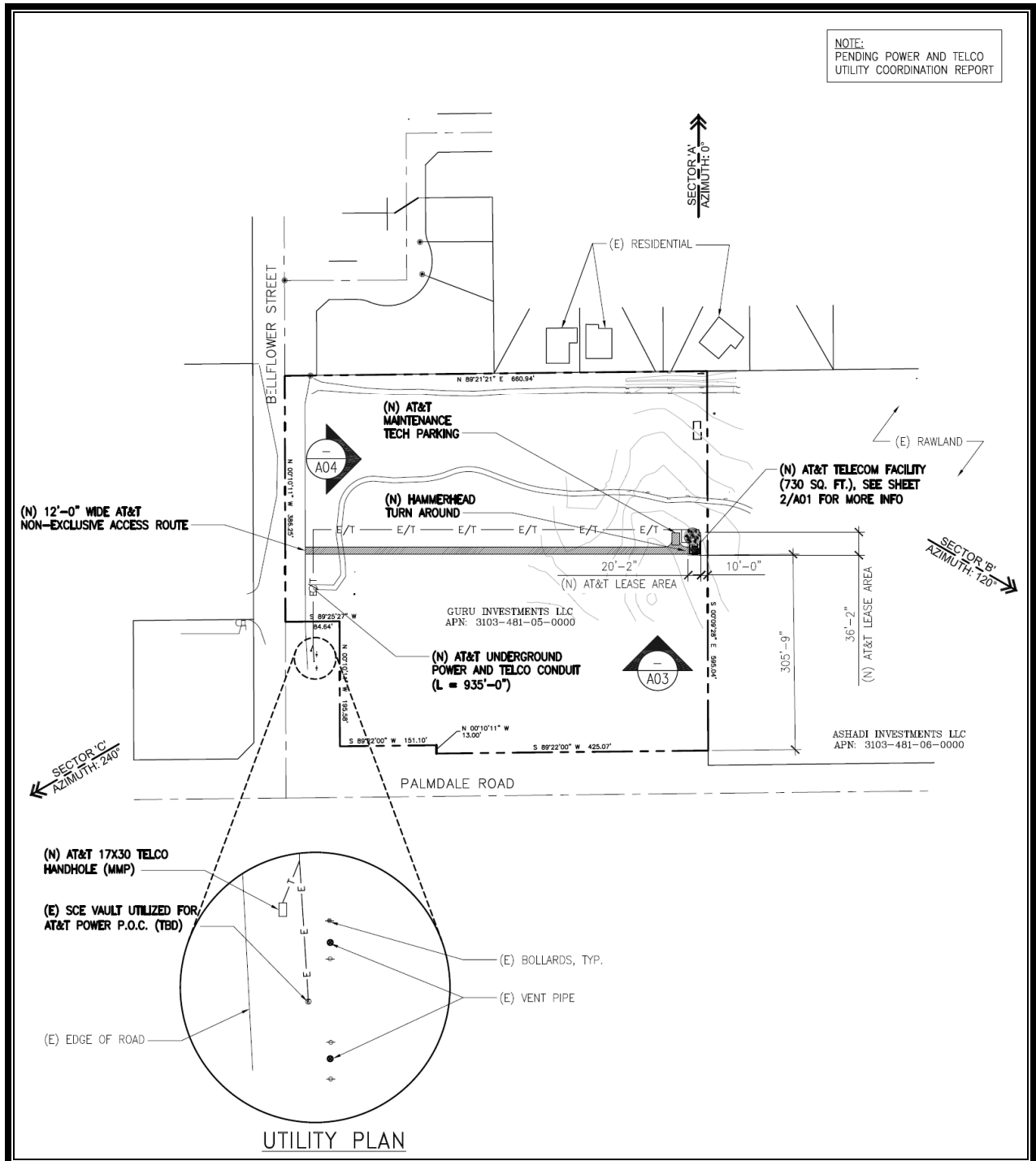


Source: Google Maps

Local Area Map

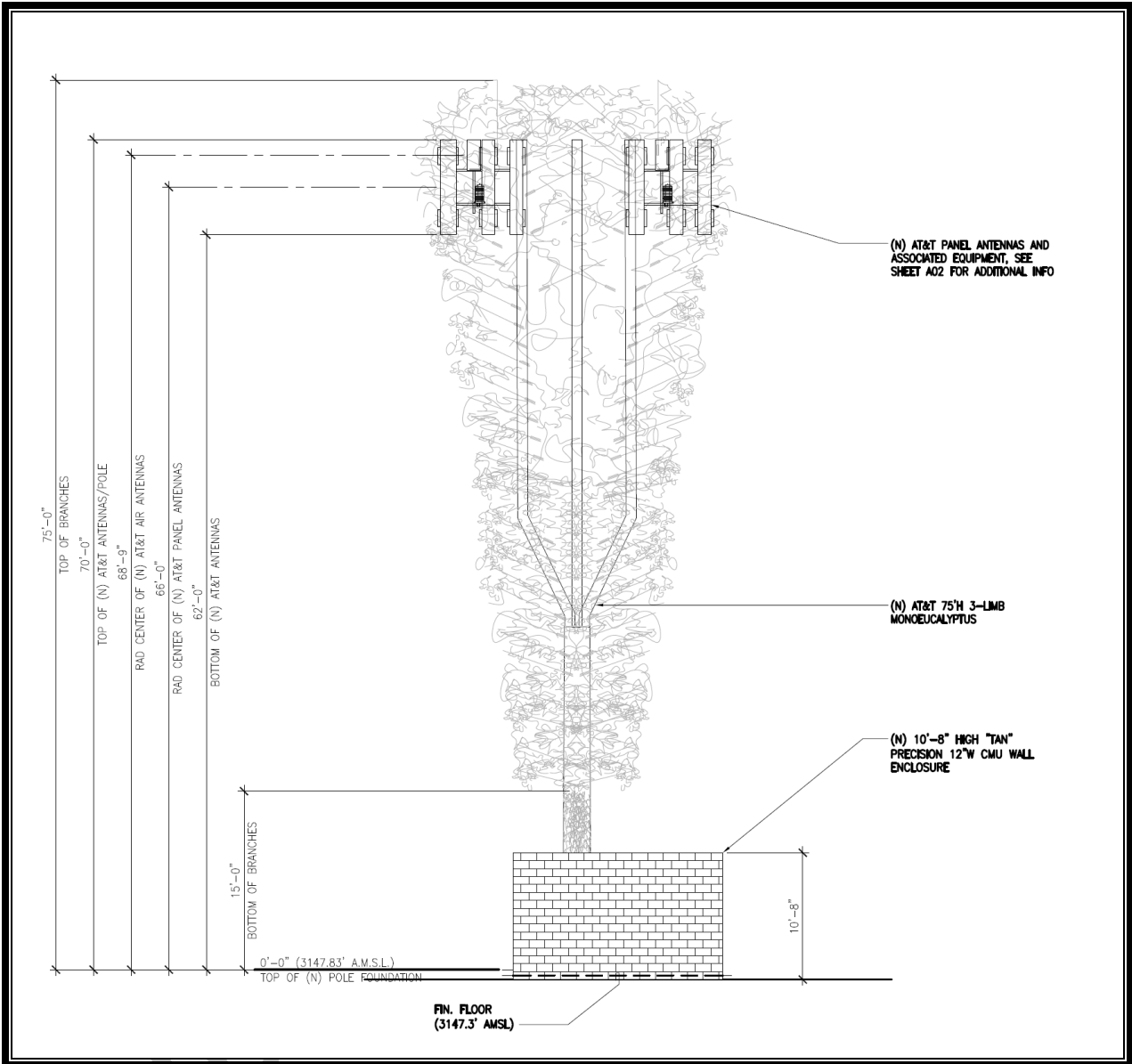


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Source: DCI Pacific

Site Plan



Source: DCI Pacific

Site Plan, Elevations



View west toward project lease area and proposed access and trench route.



View north toward proposed project.



View northeast from project location.



View west from project location.



View south from proposed location.



View west from proposed access and trench route.



View west along proposed access and trench route.



View east along proposed access and trench route.



View west along proposed access and trench route.



View east along proposed access and trench route.



View south toward proposed access and trench route.



View west along proposed access and trench route.



View east along proposed access and trench route.



View south along proposed utility trench route.



View north along proposed utility trench route.



View south toward proposed utility trench route.



View east toward Joshua tree near proposed access and trench route.



View east toward Joshua tree near proposed access and trench route.

3.0 Environmental Impact Analysis

Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.1 AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	17.80.020(e) (3&4)A.5, -B and -C			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings or historic buildings within a scenic highway?	17.80.020(e) (3&4)A.5, -B and -C Photo Simulation			X	
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings?	17.80.020(e) (3&4)A.5, -B and -C Photo Simulation			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?				X	

Aesthetics

The City of Adelanto is characterized by a relatively level topography and is in a geographic subregion of the southwestern Mojave Desert. The Mojave Desert is separated from other urbanized areas in Southern California by the San Bernardino and San Gabriel mountains. The developed/urbanized area of the city is generally flat or moderately sloping desert terrain characterized by a gradual incline from the Mojave River toward the San Bernardino Mountains to the south. Areas of high visual sensitivity within and adjacent to the city include the Transverse Range, the Mojave River, the rocky bluffs of the lower Mojave River narrows, and Mojave Narrows Regional Park.

Joshua trees are another notable aesthetic feature of the Adelanto area. Joshua trees, which can grow up to 12 meters (40 feet) tall, are distributed on gentle slopes and on valley floors of upper bajadas and sandy areas. The Joshua tree (locally protected) is an archetypal plant of the Mojave Desert that may live several hundred years; it provides valuable habitat for a variety of native wildlife species. The closest residential uses are approximately 290 feet north of the proposed facility.

Chapter 17 of the City of Adelanto Municipal Codes, Special Use Standards for Antennas and Cellular Telephone Tower, 17.80.020(e)(3&4)A.5, -B and -C, requires new towers to be



stealthed and subject to the maximum height of the subject zoning on the property or can demonstrate why a higher height is necessary. The Project complies with these aesthetic code requirements.

- a) **Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?**

Less Than Significant Impacts. The City of Adelanto has many scenic vistas of the natural high-desert and San Bernardino mountains. The AT&T facility is proposed as a stealth mono-eucalyptus and is located approximately 290 feet south of residential uses. Chapter 17 of the City of Adelanto Municipal Codes, Special Use Standards for Antennas and Cellular Telephone Tower, 17.80.020(e)(3&4)A.5, -B and -C, requires new towers to be stealthed and subject to the maximum height of the subject zoning on the property or can demonstrate why a higher height is necessary. The Project complies with these code requirements. Therefore, less than significant impacts on a scenic vista are anticipated. No long-term aesthetic impacts are likely.

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

Less than Significant Impacts. The City of Adelanto has many scenic resources, including the State listed candidate threatened species, the western Joshua tree (*Yucca brevifolia*). Based on the biological resources report prepared for this project, no impacts to the western Joshua tree will result. Therefore, this project will not substantially damage scenic resources, included but not limited to, trees, rock outcroppings or historic buildings within a scenic highway. Based on the cultural resources report, there are no historic buildings within 250' of the project.

The AT&T facility is proposed as a stealth mono-eucalyptus. The stealth facility is consistent with the City's Municipal Code for Antennas and Cellular Telephone Towers 17.80.020(e)(3&4)A.5, -B and -C. Therefore, less than significant impacts to scenic resources are anticipated.

- c) **Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?**

Less than Significant Impacts. The AT&T facility is proposed as a stealth mono-eucalyptus and is located approximately 290 feet south of residential uses. The stealth facility is consistent with the City's Municipal Code for Antennas and Cellular Telephone Towers 17.80.020(e)(3&4)A.5, -B and -C. Therefore, less than significant impacts on public views are anticipated.

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



Less than Significant Impacts. Minimal new lighting is proposed with this project in the enclosed equipment area. Therefore, the project will not create a new significant source of light or glare which would adversely affect day or nighttime views. Impacts are considered less than significant.

Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.2 AGRICULTURE AND FORESTRY RESOURCES. Would the project:					
a) Convert Prime, Unique or Statewide Importance Farmland to non-agricultural use?	Calif. Ag. Land Evaluation				X
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	Calif. Ag. Land Evaluation				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Calif. Dept. of Forestry & Fire Protection				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Calif. Dept. of Forestry & Fire Protection				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	Calif. Dept. of Forestry & Fire Protection				X

Agriculture and Forestry Resources

As of 2008, San Bernardino County contained approximately 926,992 acres of agricultural land as designated by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP). The FMMP is a non-regulatory program that produces Important Farmland maps and statistical data. The FMMP groups land into one of five categories (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land), with agricultural land being rated according to soil quality and irrigation status.



Plant communities within the undeveloped areas of the City of Adelanto include creosote bush scrub, Mojave Desert saltbush scrub, rabbitbrush scrub, ruderal (disturbed) communities, Joshua tree woodland, and riparian communities associated with the Mojave River and its floodplain, which includes transmontane alkali and freshwater marsh, Mojave riparian forest, and southern willow scrub. There is no significant forestland or timberland in the project area.

a) Would the project convert Prime, Unique or Statewide Importance Farmland to non- agricultural use?

No Impact. Based on review of the California Agricultural Land Evaluation criteria, the Project is not located in, nor is adjacent to, designated agricultural land. Based on the engineering drawings reviewed as part of the Initial Study, the proposed project will not convert prime, unique, or statewide importance farmland to non-agricultural use. Thus, no impacts are anticipated.

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

No Impact. The subject property is zoned C-Commercial. Therefore, construction of the AT&T facility is consistent with the City's municipal code for antennas and cell phone tower requirements. The City of Adelanto does not have land subject to a Williamson Act contract. Thus, no impacts are anticipated.

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

No Impact. Based on review of the City's General Plan elements and California Dept. of Forestry and Fire Protection criteria, the Project is not located in, nor is adjacent to, designated forest land, timberland or zoned for Timberland Production. Based on the engineering drawings reviewed as part of the Initial Study, the proposed project will not conflict with existing zoning, nor cause the rezoning of forest land, timberland or Timberland Production. Thus, no impacts are anticipated.

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

No Impact. Based on review of the Forestry and Fire Protection criteria, the project area is not located in, nor is adjacent to, designated forest land. Therefore, the project will not result in the loss of forest land or conversion of forest land to non-forest use. Thus, no impacts are anticipated.

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

No Impact. Based on the engineering drawings reviewed as part of the Initial Study, the proposed project will not involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. Thus, no impacts are anticipated.

Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.3 AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Air Resources Control Board		X		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Air Resources Control Board			X	
c) Expose sensitive receptors to substantial pollutant concentrations?				X	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?				X	

Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

The following provides an overview of the air quality management issues associated with short-term construction related impacts. Long-term operational impacts of the project are not anticipated, but discussion is included below. Information for this section was provided from the Mojave Desert Air Quality Management District (MDAQMD) (District), CEQA and Federal Conformity Guidelines.



The District covers the majority of the Mojave Desert Air Basin (MDAB). The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains which dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada mountains; air masses pushed onshore in southern California by differential heating are channeled through the MDAB. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet), whose passes form the main channels for these air masses. The Antelope Valley is bordered in the northwest by the Tehachapi Mountains, separated from the Sierra Nevadas in the north by the Tehachapi Pass (3,800 ft elevation). The Antelope Valley is bordered in the south by the San Gabriel Mountains, bisected by Soledad Canyon (3,300 ft). The Mojave Desert is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriels 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).

Climate

The climate in the City of Adelanto, located in the high desert - southwest portion of the Mojave Desert, has an arid climate characterized by cool winters and hot summers. The prevailing climate is known as a local steppe climate. With an average annual temperature typically of approximately 63 °F, highs in the summer average 96 °F and lows in the winter averaging 33 °F, and low humidity throughout the year. Average annual precipitation for the Adelanto, California, area is approximately 3 to 10 inches.

Air Quality Management

Air quality management planning is the responsibility of the District and the California Air Resources Board (CARB). The District sets and enforces regulations for stationary sources in the basin. The CARB is primarily responsible for controlling motor vehicle emissions.

Under CEQA, the Mojave Desert Air Quality Management District is an expert commenting agency on air quality and related matters within, or impacting on, its jurisdiction. Under the Federal Clean Air Act the District has adopted federal attainment plans for ozone and PM10. The District has dedicated assets to reviewing projects to ensure that they will not: (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan. These Guidelines are intended to assist persons preparing environmental analysis or review documents for any project within the jurisdiction of the District by providing background information and guidance on the preferred analysis approach.

The proposed project would not adversely affect the District guidelines. The District is designed to accommodate new development and growth based on Growth Forecasts. Since the proposed



project would not directly generate new population or growth, the criteria and issues of the District are not applicable to the project and are not anticipated to be affected.

Short Term Construction Activity

Particulate matter levels in the area are due to natural sources, grading operations, and motor vehicles. The California standard for total suspended particulates has been defined as particles less than 10 micrometers aerodynamic diameter (PM10). The standards are 30 ug/m³ (annual geometric mean) and 50 ug/m³ (24-hour average).

Short-term (6 to 8 weeks) construction impacts are anticipated with the proposed project. However, construction will not be continuous during this time period. Air pollutants will also be emitted from construction worker commutes. Project-related impacts are anticipated to be short-term in duration and will occur only during construction of the project. No construction will occur at night.

Backup Generator Air Quality Impacts

The project will include a new 20KW Generac backup generator with 140 gallons of diesel fuel, located within the new project area. Since a Mojave Desert Air Quality Management permit will be required for the generator, a Health Risk Assessment (HRA) may be required.

Conclusions

In summary, the proposed project will not result in significant construction-related emissions which are expected to exceed impact significance thresholds for any of the regionally significant pollutants.

No short-term or long-term impacts on climate or air quality management are anticipated. All such construction related air impacts are considered less than significant, given the short duration of construction.

Since a Mojave Desert Air Quality Management permit will be required for the generator, a Health Risk Assessment (HRA) may be required.

Once constructed, there will be no long-term odor issues since the project is an unmanned telecommunication facility.

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

Less Than Significant with Mitigation Incorporated. The City of Adelanto is located within the Mojave Desert Air Basin. Based on the engineering drawings reviewed as part of the Initial Study, the proposed project will not conflict with, or obstruct implementation of, the applicable air quality plan. The project is consistent with the City's General Plan and MDAQMD CEQA



and Federal Conformity Guidelines. An appropriate air quality permit will be required for the backup generator.

3.3a) Mitigation: Since a Mojave Desert Air Quality Management permit will be required for the backup generator, a Health Risk Assessment (HRA) may be required.

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

Less Than Significant Impacts. Based on the engineering drawings reviewed, the proposed project will not increase the number of long-term vehicle trips. Therefore, the proposed project will not result in a cumulatively considerable net increase of any criteria pollutant (auto emissions) for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The back-up generator will require an MDAQMD permit as standard practice. Therefore, this project is anticipated to have less than significant impacts.

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

Less Than Significant Impacts. The project is not anticipated to expose sensitive receptors to substantial pollutant concentrations. Long-term and short-term construction related air quality impacts are considered less than significant.

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

Less Than Significant Impacts. Section 17.90.110 (Odors) of the Adelanto Municipal Code states: “No operation or activity shall be permitted to emit odorous gases or other odorous matter in such quantities as to be dangerous, injurious, noxious, or otherwise objectionable and readily detectable without the aid of instruments at or beyond the lot line.” The project is an unmanned wireless facility and not anticipated to result in other emissions affecting a substantial number of people. Long-term and short-term construction related air quality impacts are considered less than significant.



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

Biological Resource

Based on the General Biological Evaluation prepared for this project and attached to this Initial Study and MND, the proposed Project will not significantly impact biological resources. The assessment focused on reviewing documented sensitive biological resources onsite and to use the information found in the literature review to determine the potential for these species to occur onsite.



A literature review was done using the California Department of Fish and Wildlife’s (CDFW) Natural Diversity Database¹ and California Native Plant Society’s (CNPS) Inventory of Rare and Endangered Plants. A report was prepared for sensitive species recorded within three miles of the project site. This information was used to determine which sensitive resources had been previously reported on or adjacent to the subject property. Information from other resources such as the U.S. Fish and Wildlife Service (USFWS), telecommunication site plans, and aerial photography were also reviewed.

After reviewing aerial photos, maps and various documents, it was determined which sensitive resources have a potential to occur on site. Criteria used to determine potentials of occupancy include, but are not limited to, soil types and conditions, habitat types and quality, disturbance, site history, adjacent land uses and proximity to nearest known extant populations of each respective species.

Record Search Results

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The CDFW, USFWS, and groups like CNPS and Audubon maintain special watch lists of such resources.

The CNDDB and other sources identified 26 sensitive species as having been previously reported within the vicinity of the project site. A table of the potential for these sensitive species to occur onsite is included below.

Species		Status			Potential to Affect
Scientific Name	Common Name	FWS	CDFW	CRPR	
PLANTS					
<i>Asclepias nyctaginifolia</i>	Mojave milkweed	None	None	2B.1	No Effect
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily	None	None	1B.2	No Effect
<i>Canbya candida</i>	white pygmy-poppy	None	None	4.2	No Effect
<i>Chorizanthe xanti</i> var. <i>leucotheca</i>	white-bracted spineflower	None	None	1B.2	No Effect
<i>Loeflingia squarrosa</i> var. <i>artemisiarum</i>	sagebrush loeflingia	None	None	2B.2	No Effect

<i>Opuntia basilaris var. brachyclada</i>	short-joint beavertail	None	None	1B.2	No Effect
WILDLIFE					
<i>Athene cunicularia</i>	burrowing owl	BCC	SC	-	No effect with avoidance measures
<i>Buteo swainsoni</i>	Swainson's hawk	BCC	ST	-	No Effect
<i>Gopherus agassizii</i>	desert tortoise	FT	ST	-	No effect with avoidance measures
<i>Lanius ludovicianus</i>	loggerhead shrike	BCC	SC	-	No effect with avoidance measures
<i>Phrynosoma blainvillii</i>	coast horned lizard	None	SC	-	No effect with avoidance measures
<i>Xerospermophilus mohavensis</i>	Mohave ground squirrel	None	ST	-	Not likely to occur in area ³ .

California Native Plant Society Rare Plant Rank (CRPR)	
1B	Plants rare, threatened, or endangered in California and elsewhere.
2B	Plants rare, threatened, or endangered in California but more common elsewhere
4	Watch List: Plants of limited distribution
	0.1-Seriously threatened in California (over 80% of occurrences threatened)
	0.2-Moderately threatened in California (20-80% occurrences threatened)
U.S. Fish and Wildlife Service (FWS)	California Department of Fish and Wildlife (CDFW)
FT- Federally Threatened	ST- State Threatened
BCC- Bird of Conservation Concern	SC- State Species of Special Concern

Biological Habitats

The proposed facility is to be located within open desert scrub habitat immediately to the south (approximately 290 feet) of a residential development. The surrounding areas are developed with housing tracts to the north, with interspersed undeveloped parcels to the east, west and south. There are large tracts of open desert habitats immediately to the south of Palmdale Road (located in the City of Victorville). The proposed access road and utility run will require the removal of vegetation for trenching and grading activities. The native desert scrub habitat in the area is dominated by creosote bushes (*Larrea tridentata*) and at least three (3) Joshua trees (*Yucca brevifolia*) to the west of the site, adjacent to the proposed access easement and trench route.



Impact Analysis

Of the list of 12 sensitive species having been reported in the area, one federally listed species has a potential to occur adjacent to the site:

Desert Tortoise: This federally listed species' range extends to the lower foothills of the San Gabriel Mountains. The degraded habitat on site makes it extremely unlikely desert tortoise occur within the project footprint, but tortoise could theoretically use the adjoining parcels and therefore their potential for presence in the area of the project cannot be disregarded. For this reason, appropriate avoidance measures are recommended.

There is also a potential for other state sensitive species to occur in the area:

Burrowing Owl: This small owl is relatively tolerant of human activity and can often be found in fallow fields where burrows are available. It is considered a species of concern in California and a Bird of Conservation Concern by the USFWS. No burrows are expected to be within the lease area; however, the species is known in that area and there is a potential for the species to nest adjacent to the site. Appropriate avoidance measures are recommended to ensure no direct impacts to this species occur during project implementation and that indirect impacts are reduced to levels below significant.

Loggerhead Shrike: This predatory passerine feeds on lizards, insects and small mammals. They prefer fairly open scrubland habitat with available spiny plant species for food caching. It is considered a species of concern in California and a Bird of Conservation Concern by the USFWS. This species was reported in the area. Appropriate avoidance measures are recommended to ensure that indirect impacts to this and other nesting birds are reduced to levels below significant.

Coast Horned Lizard: This reptile is found in flat areas with sparse scrub where it forages almost exclusively for ants. The habitat onsite is suitable for this species and although it may occur within the parcel, impacts to this species and the loss of less than a 1/3 of an acre of habitat is not likely to drive this species towards extinction. Regardless, measures are recommended to minimize the impacts to this and other common wildlife species to the greatest extent possible.

The biological report concluded that the proposed project will not impact or impede wildlife corridors or remove or degrade any designated critical habitat.

Wetlands

There is a relatively large desert wash approximately 175-feet to the east of the project site. This feature will need to be avoided unless a permit is obtained by federal and local agencies. There is also a small erosional feature which may fall under the jurisdiction of State or Federal agencies to the west of the lease area. The access road and utility trench will go through this feature. To ensure the project adheres to the clean water act and other codes, Best Management Practices during construction will be required.



Temporary/Indirect Impact

Indirect impacts include impacts that are temporarily incurred during construction such as noise, dust, increased human activity and pollutants. Ongoing impacts include intermittent noise from the generator, increases in human activity during maintenance visits and microwave emissions. Plants are generally not significantly impacted by indirect impacts. Wildlife may be negatively impacted in their behavior by noise and increased human activity. Most notably, nesting birds may abandon nests to escape from noise or lighting. Adjacent ornamental landscaping may support nesting birds that are protected by CDFW codes and the Migratory Bird Treaty Act (MBTA), including the burrowing owl and shrike.

Conclusion

Based on the General Biological Evaluation conducted for the Initial Study/MND, the project will not likely have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG or USFWS. Impacts are considered less than significant with the mitigation proposed below.

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

Less Than Significant with Mitigation Incorporated. A General Biological Evaluation was conducted for this Initial Study. Based on the results, the project will not have a substantial adverse effect on species identified as a candidate, sensitive or special status species with mitigation incorporated.

3.4a) Mitigation

Nesting Birds:

The surrounding habitat are likely to be used by nesting birds during the breeding season. Due to the potential for birds to nest in the vicinity of this site, including burrowing owls, le Conte's thrasher and loggerhead shrikes, if construction of this site should occur during the bird nesting season a survey should be conducted no more than 7 days prior to the start of work. The nesting season is generally considered February 15- August 30, with peak nesting occurring between March 1 and June 30. If any active nests are found within the work area or the project's zone of influence (generally 100-300 feet), work may need to be postponed, or other avoidance measures may be required to ensure the work does not cause significant impacts to nesting birds.

If an active nest is encountered during the construction by contractors or future maintenance activities, work should stop immediately until a biologist can determine the status of the nest and when work can proceed without risking violation to state or federal laws.

Mitigation

General Construction work site measures:

- *All vehicles will maintain speeds <15 mph within unpaved areas of the project site.*
- *No new roads shall be constructed other than the proposed access route and all vehicles must use the established access routes.*
- *Crews will contain and remove all trash and debris from the job site before leaving at the end of each workday.*
- *No standing water will be left on site. Any leaks will be fixed immediately to avoid any ponding.*

Mitigation

Sensitive Species measures:

- *A qualified biologist will conduct a preconstruction survey for special-status biological resources (desert tortoise and burrowing owls) no more than 7 days prior to the start of work. If any special-status wildlife or their sign (scat, active burrows, tracks, etc.) are observed, the biologist will be present during construction and/or develop a plan that best avoids impacts to any sensitive species.*
- *A biologist will provide an Environmental Awareness Training for all personnel prior to the start of any ground disturbing activities.*
- *If any sign of desert tortoise are found in the area during the preconstruction survey, a qualified biologist will be on site for the duration of the project to ensure no take of the species occurs. Additional avoidance measures will be prescribed by the biologist based on the circumstances of the observations.*
- *If a desert tortoise is encountered, work will stop until the on-site monitor determines that it is safe to resume work without impacting the tortoise.*
- *Crew will check for desert tortoise underneath parked vehicles/equipment each time a piece of equipment is moved.*

Mitigation

Western Drainage Feature:

It is highly recommended that a regulatory analysis of the small erosional feature to the west of the communication tower be performed by a qualified regulatory specialist to determine if special permitting or avoidances are required.

Mitigation

Best Management Practices:

The adjacent drainage will need to be avoided and appropriate BMPs should be followed including, but not limited to:

- *All work should be confined to the smallest area possible.*
- *No ground disturbing work should be conducted during, or immediately prior to, a rain event.*
- *Work areas should be clearly delineated with flagging or temporary fencing.*



- *All stockpiled soils should be encircled with straw wattles or silt fencing to prevent run off.*
- *No refueling of equipment shall occur on site.*

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

Less Than Significant with Mitigation Incorporated. Based on the General Biological Evaluation conducted for this Initial Study, the project will not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG or USFWS. Impacts are considered less than significant with the mitigation proposed.

3.4a) Mitigation above.

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

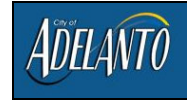
Less Than Significant with Mitigation Incorporated. There is a relatively large desert wash approximately 175-feet to the east of the project site. This feature will need to be avoided unless a permit is obtained by federal and local agencies. There is also a small erosional feature which may fall under the jurisdiction of State or Federal agencies to the west of the lease area. The access road and utility trench will go through this feature. To ensure the project adheres to the clean water act and other codes, Best Management Practices during work will be required.

Based on the General Biological Evaluation conducted for this Initial Study, the project will not have a substantial adverse effect on federally protected wetlands through direct removal, filling hydrological interruption or other means. Impacts are considered less than significant with the mitigation proposed.

3.4a) Mitigation above.

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

Less Than Significant Impacts. Wildlife movement corridors or linkages are considered sensitive by local, State, and federal resource and conservation agencies because these corridors allow wildlife to move between adjoining open space areas that are becoming increasingly isolated as open space becomes increasingly fragmented from urbanization, rugged terrain, or



changes in vegetation. The Project site is relatively small and located adjacent to existing single-family residential development that occur to the north, northeast and northwest of the Project site. There are no local or regional wildlife corridors on the Project site; therefore, the Project does not have the potential to interfere with the movement of 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 on a localized level. Impacts would be less than significant.

Based on the General Biological Evaluation, the AT&T improvements will not impact the movement of any resident or migratory fish or wildlife species. Impacts are considered less than significant.

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

Less Than Significant Impact. Chapter 17.57 (Biotic Resources) of the City of Adelanto Municipal Code establishes measures for the protection and conservation of beneficial rare and endangered plants and animal resources and their habitats. In conformance with City's Municipal Code Section 17.57.030, a biological report was prepared for the proposed Project and is attached to this IS/MND. Section 17.57.040 of the City's Municipal Code mandates compliance with the requirements of the County of San Bernardino for the relocation of Joshua trees. However, as discussed in the biological report, no Joshua trees shall be impacted by the Project. There are no other local policies or ordinances protecting biological resources that are applicable to the Project area. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Less than significant impacts are anticipated.

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

No Impacts. The City of Adelanto is located within the planning area of the West Mojave California Desert Conservation Area Plan Amendment which was adopted by the Bureau of Land Management (BLM) in 2006. The Record-of-Decision applies only to 3.3 million acres of BLM-managed lands. To date no approvals have been issued for the Habitat Conservation Plan component by the USFWS or the CDFW. All land within the Project site is located on private property outside of the areas managed by the BLM; therefore, the West Mojave California Desert Conservation Area Plan Amendment does not apply to the Project. Additionally, the City of Adelanto is located within the boundaries of the Desert Renewable Energy Conservation Plan. Phase I of the Desert Renewable Energy Conservation Plan was approved on September 14, 2016, and applies to BLM managed land only. Phase II, which would apply to non-federal land, is an on-going process and no implementing agreements have been issued. All land within Project site is located on private property outside of the areas managed by the BLM. As such, the Desert Renewable Energy Conservation Plan does not apply to the Project. Therefore, the



proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.5 CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Cultural Resource & Field Survey			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Cultural Resource & Field Survey			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?	Native American Consultation		X		

Cultural Resources

Based on the Cultural Resources Research and Field Survey prepared for this Initial Study and attached to this MND, the proposed Project will not significantly impact cultural resources with mitigation incorporated.

Regional Archaeological Studies

An overview of the regional archaeological and historical literature provides background information. It summarizes current archaeological knowledge and the cultural traditions represented in the region, as well as unresolved problems of information and interpretation that give significance to the heritage resources that might be encountered.

Prehistory

Of the many chronological sequences proposed for southern California, two primary regional syntheses are commonly used in the archaeological literature. The first, advanced by Wallace (1955), defines four cultural horizons for the southern California coastal province, each with characteristic local variations:

- I. Early Man (~9000 8500 B.P.)
- II. Milling Stone (8500 4000 B.P.)
- III. Intermediate (4000 1500 B.P.)



IV. Late Prehistoric (1500~200 B.P.)

Warren and Crabtree employ a more ecological approach to the deserts of southern California, defining five periods in prehistory (1986):

- I. Paleo-Indian – Clovis Complex Desert Culture (10,000-8,000 B.C./12,000-10,000 B.C)
- II. Lake Mojave Complex (c. 8,000-6,000 B.C/9,000-5,000 B.C)
- III. Pinto Complex (7,000-3,000 B.C./5,000-2,500 B.C)
- IV. Gypsum Complex (c. 2,000 B.C – 500 A. D.)
- V. Saratoga Springs Complex (c. 500-1,200 A.D)
- VI. Late Prehistory Complex (c. 1,200 A.D. – Contact)
- VII. Ethnohistoric Cultural Complex (Post-Contact)

Cultural Record Search and Results

The study included:

- 1) a records search conducted by the South Central Coastal Information Center;
- 2) a review of archival information and reports concerning the project area;
- 3) a field reconnaissance of the Project Direct-Impacts APE/Project site;
- 4) a 0.5-mile-radius windshield review of the Indirect-Impact APE/surrounding area;
- 5) a 0.5-mile-radius search for sites listed on the National Register of Historic Places and for Properties listed as eligible in the California Office of Historic Preservation’s 2022 Built Environment Resources Directory (BERD), and
- 6) preparation of a report.

The report utilizes the general format recommended by the California Office of Historic Preservation: “Archaeological Resource Management Reports (ARMR): Recommended Contents and Format” (OHP 1989). Research materials and field notes, associated with this investigation are currently on file at Heritage Resources, P.O. Box 8, Ramona, California, 92065.

Record searches were completed by the South-Central Coastal Information Center for the Indirect-Impacts APE. Under the “Covid-19 Emergency Protocols for San Bernardino County Record Searches” the record search only included an area of one-quarter mile and data that the Center already has digitized. An on-line search of the National Parks Service website and the Wikipedia National Register website was conducted to identify any properties listed on the National Register of Historic Places within 0.5-mile. The California Office of Historic Preservation’s 2022 Built Environment Resources Directory (BERD) was searched for Properties identified as appearing eligible for the National Register (Status codes 1D, 1S, 2B, 2D, 2D2, 2D3, 2D4, S, S2, S3, S4, 3B, 3D, 3S, and 4CM) within 0.5-mile. Other research materials included primary and secondary sources in the author’s research library and available on-line.

In summary, the project site is located within territory traditionally claimed by the Serrano Group, whose occupations were reportedly focused near water sources. Prehistoric use of the Project vicinity appears to have been low based on the lack of prehistoric sites recorded within



0.25 mile. Historically, the area of Adelanto consisted of orchard and poultry agriculture and after World War II, developed in rural residential.

No properties are listed on the National Register of Historic Places or listed as appearing eligible for the National Register in the California Office of Historic Preservation's 2022 Built Environment Resources Directory (BERD) within 0.5 mile of the Project facility.

One archaeological/historical study, with negative results and not including the proposed Project/Direct-Impact APE, is documented at the SCCIC as having been completed within one-quarter mile of the Project. Two cultural resources have been otherwise recorded within 0.25 mile of the proposed Project/Direct-Impact APE, the historic Palmdale to Victorville Road (P-36-01289) and a minor domestic trash scatter (P-36-026824). Both have been determined or recommended not eligible for the National Register of Historic Places.

Field Survey and Results

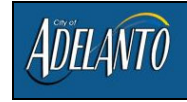
The Direct-Impact APE (the Project site footprint plus a 20-foot buffer) was inspected on foot by an archaeologist/historian. The proposed Project/Direct-Impact APE is located in a vacant undeveloped lot at the northeast corner of the intersection of Bellflower Street and Palmdale Road. The monopole and enclosure location were inspected. The east-west access road and power/telco conduit trench location were walked in four east-west transects. The north-south power/telco conduit trench location along the east side of Bellflower Street was walked in two north-south transects. The 0.5-mile-radius Indirect-Impact APE was inspected via a limited windshield survey as no Historic Properties are recorded within 0.5 mile.

As a result of the survey of the Direct-Impact APE/Project facility footprint, no archaeological or historical resources were discovered. The proposed Project location / Direct-Impact APE in a vacant lot has been highly disturbed by off-road use, erosion, trash-dumping, and transient use but still retains a hummocky topography resulting from wind-blown sands held in mounds by desert scrub vegetation. Surface soils consisted of sandy-gravelly silt with quartz and other water and weather-worn small rocks. Surface visibility was good during the survey.

The surrounding land uses are modern subdivision residential to the north, one commercial complex to the west, and vacant land and widely spaced rural residential to the south and east. The windshield review encountered no additional potential historic resources.

Impact Assessment

Archaeological field survey was completed for the Project Direct-Impact APE and archival research was conducted for both the Project Direct-Impact APE and the Indirect-Impact APE. (It should be noted that under the "Covid-19 Emergency Protocols for San Bernardino County Record Searches" the record search only included an area of one-quarter mile radius and data that has already been digitized).



- No archaeological or historical resources were identified in the Project Direct-Impacts APE.
- No historical resources are listed on the National Register of Historic Places or listed as eligible for the National Register in the California Office of Historic Preservation’s 2022 Built Environment Resources Directory (BERD) within the one-half-mile-radius Indirect-Impact APE.

Given that the research and survey identified no archaeological or historical resources within the Direct-Impact APE and no archaeological or historical resources listed on the National Register of Historic Places or listed as eligible for the National Register in the California Office of Historic Preservation’s 2022 Built Environment Resources Directory (BERD) within the Direct-Impact APE or the Indirect-Impact APE, the report concludes with a recommended finding of “No Historic Properties in the Area of Potential Effects (“APE”)” for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the cultural report prepared for this Initial Study/MND, the AT&T facility will not have direct or indirect impacts to any historic properties. This leads to a finding of less than significant impacts for cultural resources. However, based on information from the tribal consultation conducted, mitigation is recommended.

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

Less Than Significant Impacts. The definition of “historical resources” is contained in Section 15064.5 of the CEQA Guidelines. Resources listed in or determined to be eligible for listing in the California Register are resources that must be given consideration in the CEQA process. Based on the results of the cultural report, the property is not listed within the National Register of Historic Places, as a National Historic Landmark, or with the local Historical Commission. Therefore, the project will not cause substantial adverse change in the significance of a historical resource defined in Section 15064.5 of CEQA. Impacts are considered less than significant.

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

Less Than Significant Impacts. The definition of “historical resources” is contained in Section 15064.5 of the CEQA Guidelines. Resources listed in or determined to be eligible for listing in the California Register are resources that must be given consideration in the CEQA process. Based on the site visit conducted and analysis of the records reviewed, the proposal project will not impact the resources listed. Therefore, based on the cultural resource report prepared for this Initial Study, the project will not cause substantial adverse change in any significance of an archaeological resource defined in Section 15064.5 of CEQA. Impacts are considered less than significant.



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

Less Than Significant with Mitigation Incorporated. It is unlikely that human remains or those interred outside of formal cemeteries will be impacted by construction of the Project. However, based on information from the tribal consultation conducted, the following mitigation is recommended.

3.5c) See Mitigation 3.18b.

Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.6 ENERGY. Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	City General Plan				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	City General Plan				X

Energy

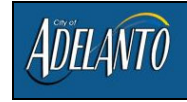
- a) **Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

No Impact. Based on the type of Project proposed, it will not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No impacts are anticipated.

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

No Impact. Based on the type of Project proposed, it is anticipated to have no such impacts that would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

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



Geology and Soils

Regional Geology

Adelanto is a city located in the western Mojave Desert in the High Desert sub-region of San Bernardino County known as Victor Valley. Adelanto is bordered by the City of Victorville on the east and south. At 20,105 square miles, San Bernardino County is the largest county by area in the U.S.

The geologic complexity of the central and western Mojave Desert, however, has posed a major stumbling block in attempts to reconstruct the paleogeography and tectonic history of the southern part of the Cordilleran orogenic belt. In the central and western Mojave Desert, bed-rock exposures consist chiefly of Tertiary volcanic rocks and Mesozoic granitic rocks. Because of the lack of exposure of older rocks in this terrane, the southwestward continuation of miogeoclinal facies and isopach trends and the timing and nature of structural events in this region are very poorly known in comparison to what is known about the eastern Mojave Desert region.

Geology/Seismicity

The Mojave Desert is bounded on the west and southwest by the San Andreas fault and on the north by the Garlock fault. The rapidly growing City of Adelanto in the southwestern Mojave Desert and lies approximately 90 miles northeast of the City of Los Angeles. The land surface in this region consists of isolated hills, mountains or groups of mountains which are separated by extensive areas of alluvium. The highest elevations within the areas are 5,125 feet at Sidewinder Mountain and 4,532 feet at Quartzite Mountain.

The project area is located in seismically active Southern California, a region that has experienced numerous earthquakes in the past. The Alquist-Priolo Special Studies Zones Act specifies that an area termed an Earthquake Fault Zone is to be delineated if surrounding faults that are deemed sufficiently active or well defined after a review of seismic records and geological studies. Neither the City nor the project area is located within any Alquist-Priolo Special Studies Zones.

- a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)**

No Impact. Based on the type of Project proposed, it will not expose people or structures to potential substantial adverse geologic effects such as, 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. The project is an un-manned facility.

ii) Strong seismic ground shaking?

No Impact. Although no recorded earthquake faults occur within the Project boundary, the Project site is located 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. However, based on the type of project, it is anticipated to have no such impact. The project is an un-manned facility.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction describes a phenomenon in which cyclic stresses, produced by earthquake-induced ground motion, create excess pore pressures in relatively cohesionless soils. These soils may thereby acquire a high degree of mobility, which can lead to lateral movement, sliding, settlement of loose sediments, sand boils and other damaging deformations. This phenomenon occurs only below the water table, but, after liquefaction has developed, the effects can propagate upward into overlying non-saturated soil as excess pore water dissipates. However, based on the type of project, it is anticipated to have no such impact. The project is an un-manned facility.

iv) Landslides?

No Impact. There are no prominent hills within the Project vicinity that could subject the Project site to hazards associated with landslides. Thus, the potential for landslides is considered negligible. As such, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact would occur. The project is an un-manned facility.

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

No Impact. Based on the type of project, it will not likely expose people or structures to substantial soil erosion or loss of topsoil. BMP's will be required during construction. The project is an un-manned facility.

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

No Impact. 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. 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. As such, there are no impacts due to landslides/lateral spreading.

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. As such, there are no impacts due to subsidence.

Based on the type of project, it does not appear to be recorded as located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. BMP's will be required during construction. The project is an un-manned facility.

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

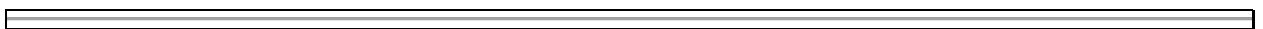
No Impact. Based on the type of project, it is anticipated to have no such impact.

e) Would the project 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?

No Impact. Based on the type of project, it is anticipated to have no such impact. No septic tanks or alternative wastewater disposal systems are proposed. The project in an un-manned facility.

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

No Impact. 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. However, based on the type of project, it is anticipated to have no such impact.





Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.8 GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	City General Plan			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	City General Plan			X	

Greenhouse Gas Emissions

Regulatory Setting

With the passage of California Assembly Bill AB32, the Global Warming Solutions Act of 2006, jurisdictions are required to reduce their greenhouse gas (GHG) emissions to 1990 levels by 2020. To comply with this legislation, in 2008 the City Council authorized and directed Staff to collaborate with San Bernardino County Transportation Authority (SBCTA was formerly SANBAG - San Bernardino Association of Governments) to conduct a Countywide GHG inventory and GHG Reduction Plan. With that process complete, the City of Adelanto has adopted a Climate Action Plan (CAP) to demonstrate how the City will reduce its GHG emissions in compliance with AB32. The CAP is not additional regulation created by Adelanto, in as much as the regulation to reduce GHG's already exists under CEQA, including Section 15064.4, Determining the Significance of Impacts from GHG Emissions.

Greenhouse Gas Emissions

The natural process through which heat is retained in the troposphere is called the “greenhouse effect.” The greenhouse effect traps heat in the troposphere through a three-fold process as follows: (1) short-wave radiation in the form of visible light emitted by the Sun is absorbed by the Earth as heat; (2) long-wave radiation re-emitted by the Earth; and (3) GHGs in the atmosphere absorbing or trapping the long-wave radiation and re-emitting it back towards the Earth and into space. This third process is the focus of global climate change actions.

Common GHG include water vapor, carbon dioxide, methane, nitrous oxides, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride (SF6), ozone, and aerosols. Natural processes and human activities emit GHG. The accumulation of GHG in the atmosphere regulates the earth’s temperature. Without the natural heat trapping effect of GHG, the earth’s surface would be about 34 degrees Centigrade (°C) cooler (CAT 2006). However, it is believed that emissions from human activities, such as carbon-based electricity production and vehicle use, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.



Auto Emissions

The United States Bureau of Transportation Statistics suggests that an average United States “trip” is about 11.4 miles. The amount of gasoline consumed per year can be estimated by multiplying the total miles traveled per project trip by the United States fuel economy average of 25 miles per gallon. Combustion of one gallon of gasoline produces about 19 pounds of carbon dioxide. The project is an unmanned telecommunication facility on vacant undeveloped property. Therefore, the area is not subject to a GHG investigation.

Implementation

Global Climate Change impacts are a result of cumulative emissions from anthropogenic activities in the region, the State, and the world. Based on the proposed Project it would not have a significant impact with regard to emissions associated with greenhouse gas emissions and global climate change.

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

Less Than Significant Impacts. In determining the significance of a project’s greenhouse gas (GHG) emissions, the City should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. Bases on the type of unmanned wireless facility proposed, the project will have no new impacts on GHG’s. Impacts are considered less than significant.

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

Less Than Significant Impacts. Bases on the type of unmanned wireless facility proposed, the project will not conflict with the City’s policies to reduce GHG’s. Impacts are considered less than significant.

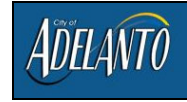


Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.9 HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine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

Hazards and Hazardous Materials

Regulatory Setting

GeoTracker is the State Water Resources Control Boards' data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. GeoTracker contains records for sites that require cleanup, such as Leaking



Underground Storage Tank (LUST) Sites, Department of Defense Sites, and Cleanup Program Sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including: Irrigated Lands, Oil and Gas production, operating Permitted USTs, and Land Disposal Sites. GeoTracker portals retrieve records and view integrated data sets from multiple State Water Board programs and other agencies.

A review of the State Water Resources Control Board GeoTracker database did not reveal the Project Site in the regulatory database. However, the adjacent Shell gas station to the southwest is listed as a permitted Underground Storage Tank site. No violations were listed.

The closest LUST site was estimated to be greater than 1 mile east from the Project Site, along Palmdale Road and is listed as Case Closed-Completed. Additional LUST sites are reported along the Highway 15 corridor, which is greater than 2 miles east of the Project site. These sites are not likely to present an environmental concern to the Project due to their regulatory status, distance from the Site, and/or cross or down-gradient location. Based on the regulatory database, regional groundwater plume contamination is not reported for the subsurface areas beneath the Site and immediately surrounding area.

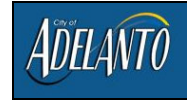
a) Would the project create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less Than Significant Impacts. AT&T is proposing one backup diesel generator within the lease area. Typical telecommunication generators require additional fuel approximately every 6 months to a year, depending on the number of outages for which the generator is utilized. Generator regulations require refilling of generators to be in conformance with State and Local hazardous materials guidelines. Based on the limited number of refills on an annual basis, and the absence of a reported release to soil or groundwater, or violation records, the project would not likely create significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. Impacts are considered less than significant.

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

Less Than Significant Impacts. The diesel generator refill operation requires licensed providers of fuel. Based on the project information, the project will not create any further significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release or hazardous materials into the environment. Impacts are considered less than significant.

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



Less Than Significant Impacts. The project will maintain hazardous materials logs associated with the generator, batteries and appropriate emergency equipment. Based on the project information, the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste. The closest school appears to be the Desert Trails Preparatory Academy, located approximately ½ north of the Project along Bellflower Street. The next closest schools appear to be Columbia Middle School and Theodore Vick School, both located approximately 1 mile northwest of the Project. Adelanto High School is located approximately 3 miles northwest of the Project. Vista Verde Elementary School, located in Victorville, is approximately 1 mile southeast of the Project. Due to these school locations, less than significant impacts are anticipated.

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

No Impact. The project Site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Therefore, no impacts are anticipated.

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

No Impacts. The project is not located within 2 miles of a public airport or public use airport that would result in safety hazards or excessive noise. The closest airport is the Southern California Logistics Airport (formerly George Air Force Base, closed in 1989) located approximately 7 miles north of the project site. No impacts are anticipated.

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

No Impact. Based on the project information, the project will not impair long-term implementation or physically interfere with an adopted emergency response plan. Both Palmdale Road and Bellflower Street will remain open at all times during construction. No impacts are anticipated.

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

Less Than Significant Impacts. Safety precautions are required when fuels are used for backup generators. Based on the project information, the project will not expose people or structures to



a significant risk of loss, injury or death involving wildland fires. Impacts are considered less than significant.

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



Hydrology and Water Quality

Existing Hydrologic Setting

The Adelanto area is located on top of a gently sloping alluvial fan situated to the northeast of the San Bernardino Mountains. Local hydrology is dominated by the Mojave River to the east, which drains the mountainous areas located to the south. Several smaller intermittent streams drain into the Mojave River. The Federal Emergency Management Agency (FEMA) through the National Flood Insurance Program has identified and mapped those areas of Adelanto that are at risk due to periodic flooding. The resulting Flood Insurance Rating Map (FIRM) is designed for flood insurance and flood plain management applications. The "FIRM" map includes flood zone designations which refer to specific areas which may be subject to flooding based on engineering and hydrologic studies. The map identifies 100-year and 500-year flood plains, floodways, location of selected cross-sections used in the hydrologic studies, and the anticipated floodwater depths.

Based on review of the FEMA flood map, attached to this Initial Study, the project is within flood map number 06071C5795H dated 8/28/2008. The project area, and surrounding area, are located in Zone D, which is described by FEMA as "Areas in which flood hazards are undetermined, but possible". The proposed generator may be required to be elevated above the Base Flood Elevation (BFE) based on the direction from the City.

Conclusions

The project will not significantly increase impervious surfaces or impede storm flows. The amount of disturbed area for the project is a small percentage of the overall drainage area. Water quality issues will not change from existing levels. AT&T will implement Best Management Practices during construction to avoid sediments to leave the Site in the event of a storm.

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

No Impact. The project is an unmanned wireless facility. Best management practices will be required during construction. Implementation of the project will not violate water quality standards or waste discharge requirements. No impacts on water quality are anticipated.

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

No Impact. Based on the type of project, an unmanned wireless facility, it will not deplete groundwater supplies or interfere substantially with groundwater recharge. Best management practices will be required during construction. No impacts to groundwater are anticipated.

c) Would the project substantially alter the existing drainage pattern of the site or area,

including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would;

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

Less Than Significant with Mitigation Incorporated. Based on the type of project, it will not change the drainage configuration on site, nor will it 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. The project, an unmanned wireless facility, once constructed, will not result in substantial erosion or siltation. Best management practices will be required during construction. Impacts are considered less than significant with mitigation incorporated.

3.10 c) i) Mitigation: The contractor will be required to implement Best Management Practices, as necessary.

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

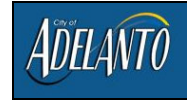
Less Than Significant Impacts. Based on the type of project, minor impervious surfaces will be created with the equipment foundations required. Storm drainage off the site is currently directed to the existing storm drain systems to the west and north. The Project will not increase the existing rates of surface runoff resulting in flooding. Best management practices will be required during construction. Impacts are considered less than significant.

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

Less Than Significant Impacts. Based on the type of project, minor impervious surfaces will be created with the equipment foundations required. Storm drainage off the site is currently directed to the north and west. The project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Best management practices will be required during construction. Impacts are considered less than significant.

d) Would the project result in flood hazards, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impacts. Based on the type of project, minor impervious surfaces will be created. Storm drainage off the site is currently directed to the north and west. The project will not result in flood hazards, tsunami, or seiche zones, or risk release of pollutants due to



project inundation. Best management practices will be required during construction. Impacts are considered less than significant.

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

Less Than Significant Impacts. Based on the type of project, minor impervious surfaces will be created with the equipment foundations required. Storm drainage off the site is currently directed to the north and west. The project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts are considered less than significant.



Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.11 LAND USE AND PLANNING. Would the project:					
a) Physically divide an established community?	City General Plan and Transp./Circ Element				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	City General Plan and Transp./Circ Element				X

Land Use and Open Space

The Land Use Element of the City of Adelanto’s General Plan functions as a guide to the ultimate pattern of development for Adelanto, both within its incorporated boundaries and sphere of influence. As required by Section 65302(a) of the state Government Code, the Land Use Element describes the proposed general distribution, location and extent of land uses within the City of Adelanto, as well as their relationship to all elements of the General Plan.

The current zoning designation is Commercial (C). Existing residential uses are located approximately 290 feet north of the proposed facility. The use of the property as a telecommunication site is consistent with the City’s land use element, general commercial uses, and Chapter 17 of the City of Adelanto Municipal Codes, Special Use Standards for Antennas and Cellular Telephone Tower, 17.80.020(e)(3&4)A.5, -B and -C.



a) Would the project physically divide an established community?

No Impact. Based on the type of wireless communication facility, the project will not physically divide an established community. Therefore, the project will have no such impacts.

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

No Impact. Based on the type of wireless communication facility, and consistency with Chapter 17 of the City of Adelanto Municipal Codes, Special Use Standards for Antennas and Cellular Telephone Tower, 17.80.020(e)(3&4)A.5, -B and -C, the project will not conflict with applicable land use plan, policy, or regulation. No impacts are anticipated.

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

Mineral Resources

Naturally occurring mineral resources within the city include sand, gravel, or stone deposits that are suitable as sources of concrete aggregate, located primarily along the Mojave River. No mineral extraction activities are currently taking place within the parent property. The General Plan for the City of Adelanto does not identify locally important mineral resource recovery sites within the Project or surrounding areas, and the Project site is not located within the boundaries of an adopted specific plan.

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



No Impact. Based on the type of project, it will not result in the loss of available known mineral resources. The project is anticipated to have no such impacts.

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

No Impact. There are no land use plans that identify the Project site or surrounding areas as a locally-important mineral resource recovery site. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur.



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

Noise

The City of Adelanto General Plan Noise Element and Municipal Code 17.90.020 identifies residential land uses as being sensitive to noise. The closest residential use is located approximately 290 feet north of the proposed facility. Noise levels of up to 65 decibels (dB) are considered normally acceptable without any special noise insulation requirements since normal construction techniques reduce the exterior noise level by 20 decibels (dB). Based on the type of



unmanned telecommunication facility, no impacts to the City's Noise standards are anticipated. Short term noise may result due to construction activity. The Adelanto Municipal Code anticipates such occurrences and accordingly regulates such activities through base ambient noise level time frames that will mitigate potential adverse impact. No construction is proposed at night.

Existing Setting

The most common sources of noise in Adelanto are transportation related noise sources. These include automobiles, trucks, busses, motorcycles, and aircraft. The predominant noise source for the City are automobile and truck noises along Highway 395, Palmdale Road and Bellflower Street as it leads north to Highway 395. The maximum noise levels are usually due to trucks or loud cars. Minimum noise levels occur when traffic is very light. There is a morning peak hour after which traffic noise remains somewhat consistent throughout the day. In the late evening, traffic and noise decrease to very low levels.

Conclusions

The proposed project is anticipated to have short-term noise impacts during construction (6 to 8 weeks), although construction will not be continuous during this time period. No work is proposed at night. Short-term noise levels will not be in excess of standards established in the City General Plan Noise Element or Municipal Code 17.90.020 for Performance Standards. The City of Adelanto shall verify contractor compliance with standard noise reduction requirements during construction, including but not limited to, restrictions on working hours.

The project will also include an emergency backup 20KW AC Generac generator with a 140-gallon diesel tank within the enclosed equipment wall. The generator is tested semi-annually to annually and will only run during an emergency outage. No additional significant noise or vibrations will be generated from the project. No long-term noise impacts are anticipated after construction.

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

Less Than Significant Impacts. The project will not expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. No additional significant noise or vibrations will be generated from the project. Impacts are considered less than significant. No long-term noise impacts are anticipated after construction.

The closest residential use is located approximately 290 feet north of the proposed facility. Short-term (6 to 8 weeks) construction-related noise will be generated during construction, although construction will not be continuous during this time period. No work is proposed at



night. Sources of noise during construction include truck road-noise, backup alarming and motorized construction equipment. Short-term noise levels will not be in excess of standards established in the City General Plan or City Noise Ordinance. The City of Adelanto shall verify contractor compliance with standard noise reduction requirements during construction, including but not limited to, restrictions on working hours. Impacts are considered Less Than Significant.

b) Will the project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impacts. The project in an unmanned wireless facility and will not expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. The proposed project may create short-term construction vibrations; however these are unlikely. Impacts are considered less than significant.

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

No Impact. The closest airport is the Southern California Logistics Airport (formerly George Air Force Base, closed in 1989) located approximately 7 miles north of the project site. No impacts are anticipated.



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

Population and Housing

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

No Impact. The project will not induce substantial unplanned population growth. The project is an unmanned wireless telecommunication facility. The proposed project is anticipated to have no growth impacts.

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

No Impact. The project will not displace existing housing. The project is an unmanned wireless telecommunication facility. The proposed project is anticipated to have no such impacts.

Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.15 PUBLIC SERVICES. Would the project:					
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i) Fire protection?					X
ii) Police protection?					X
iii) Schools?					X
iv) Parks?					X
v) Other public facilities?					X



Public Services

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

i) **Fire protection?**

No Impact. The project will not result in substantial adverse physical impacts to Fire protection. Fire authorities will be alerted to the construction should an emergency arise. The San Bernardino County Fire Department will likely require a Hazardous Material Plan to be submitted for the backup generator. Both Palmdale Road and Bellflower Street will remain open at all times during construction. The proposed project is anticipated to have no impacts.

ii) **Police protection?**

No Impact. The project will not result in substantial adverse physical impacts to Police protection. Police authorities will be alerted to the construction should an emergency arise. Both Palmdale Road and Bellflower Street will remain open at all times during construction. The proposed project is anticipated to have no impacts.

iii) **Schools?**

No Impact. The project will not result in substantial adverse physical impacts to school access. The closest school appears to be the Desert Trails Preparatory Academy, located approximately ½ north of the Project along Bellflower Street. The next closest schools appear to be Columbia Middle School and Theodore Vick School, both located approximately 1 mile northwest of the Project. Adelanto High School is located approximately 3 miles northwest of the Project. Vista Verde Elementary School, located in Victorville, is approximately 1 mile southeast of the Project. Both Palmdale Road and Bellflower Street will remain open at all times during construction. The proposed project is anticipated to have no impacts to schools.

iv) **Parks?**

No Impact. The project will not result in substantial adverse physical impacts to parks. The proposed project is anticipated to have no impacts.

v) **Other public facilities?**



No Impact. The project will not result in substantial adverse physical impacts to other public facilities. The proposed project is anticipated to have no impacts.

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

Recreation

The city currently has approximately 30 acres of developed park land comprising the City’s 4 parks.

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

No Impact. The project will not result in increases to usage of existing parks as this is an unmanned telecommunication facility. The proposed project is anticipated to have no such impacts.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. The project will not result in increases to usage of existing recreation facilities as this is an unmanned telecommunication facility. The proposed project is anticipated to have no such impacts.

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

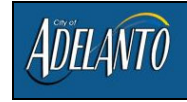
Transportation

The City of Adelanto Circulation Element is one of the required General Plan elements identified in State Planning and Zoning Law. As specified in California Government Code (Section 65302(b)), a Circulation Element is required to identify the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, airports and other local public utilities and facilities in the City. The Element is intended to provide guidance to decisions that expand and improve the transportation system for local and regional trips, and to accommodate the diverse transportation needs of the residents of the area. Furthermore, this Element is intended to specify the City’s policies for coordination of transportation infrastructure planning with planning of public utilities and facilities, where joint benefits can be achieved.

Existing Setting

The project site is located north of Palmdale Road and east of Bellflower Street. Bellflower Street is a two laned local street trending north-south in this area, with no curb, gutter or sidewalk in the area of the subject property. Further north on Bellflower are single family homes, and the street is improved with curb, gutter and sidewalk, overhead street lighting and underground utilities, sewer and water. This area of Bellflower Street has mature landscaping and landscape irrigation.

Palmdale Road (Highway 18) is a two-laned major arterial trending east-west in this area, with left and right turn lanes onto Bellflower Street. Curb, gutter and sidewalks are only located along the commercial gas station area of Palmdale Road. The balance of Palmdale Road is unimproved beyond the paved street. This area of Palmdale Road includes overhead power and telephone lines, street signage, and underground utilities.



Conclusions

During construction, short-term traffic and parking impacts may result along Bellflower Street. However, these impacts are considered less than significant levels through traffic control measures, construction timing and construction phasing to avoid peak hour drive times. No long-term traffic impacts are anticipated for this un-manned facility and only needs periodic maintenance.

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

Less Than Significant Impacts. During construction, short-term traffic related impacts may result along Bellflower Street. Therefore, traffic control measures, construction timing and construction phasing to avoid peak hours will be implemented. Impacts are considered less than significant.

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

No Impact. The project will not result in increases to established congestion management plans as this is an unmanned telecommunication facility. The proposed project is anticipated to have no such impacts.

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

No Impact. The project will not result in increased hazards due to design features. The proposed project is anticipated to have no impacts.

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

Less Than Significant Impacts. After construction, the proposed project is not anticipated to result in inadequate emergency access or inadequate access to nearby uses. During construction, short-term parking access impacts may result. Both Palmdale Road and Bellflower Street will remain open at all times during construction.



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

Tribal Cultural Resources

The project is located within the boundaries of the Serrano Group. Their territory ranged from the mountain and desert valley area to the east of the upper Mojave River. Included in this area were springs and mountains to the south of the lower Mojave River, including Ord Mountain and also Lucerne Valley and Old Woman Springs. The hills and mountains around and just to the northeast of Adelanto were named separately as Pat’ Kaitis (Mountain Sheep Mountains). The Serrano Group spoke a dialect of the Takic subset of the large Uto-Aztecan languages. The term Serrano came from the Spanish word “highlander” or “mountaineers”, in the late 18th century it began being used to distinguish the Serrano people from the neighboring tribes (Kroeber 1925).

The Native American Heritage Commission (NAHC) was contacted regarding potential Native American cultural resources in the immediate project area. The NAHC responded to the inquiry on January 12, 2022. While the absence of specific site information in the sacred lands file does not indicate the absence of cultural resources, a list of six (6) Native American individuals/organizations was provided for consultation. The following parties have responded:

- Quechan Historic Preservation, Jill McCormick, Historic Preservation Officer responded via email on February 14, 2022: “This email is to inform you that we do not wish to comment on this project. We defer to the more local Tribes and support their determinations on this matter.”



- James Nord, Cultural Resources Technician with the San Manuel Band of Mission Indians replied via email on December 9, 2021 requesting additional information. The additional information was provided on December 9, 2021 and Mr. Nord responded on February 14, 2022 and the recommendations have been included as mitigation below.
- No other Native Americans and/or Tribes have responded as of the date of this Initial Study.

The FCC Tower Construction Notification System (TCNS) was contacted due to the FCC licenses that AT&T holds. The TCNS automated system replied on November 26, 2021. Fifteen (15) tribes were listed on the TCNS correspondence. However, the tribes listed were either beyond the area of interest or were previously contacted through the NAHC. No tribe consulted with expressed a specific concern with the proposed site. However, in an email dated February 14, 2022, the San Manuel Band of Mission Indians provided inadvertent findings language for the project. The TCNS process was completed as of April 1, 2022.

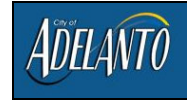
- Northwest Tribal Consult replied with No adverse effects.
- No other Native Americans and/or Tribes have responded as of the date of this Initial Study.

a) Is the project listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less Than Significant Impacts. Based on the findings in the Cultural Resource report, the property is not listed on the National Register of Historic Places, as a National Historic Landmark, or with the San Bernardino County Historical Commission as a designated historic landmark or historic site.

Conclusions in the Cultural report found that it is unlikely that new resources will be impacted by construction of the Project, as the area is located on soil that has been previously highly disturbed by off-road use, erosion, trash-dumping, and transient use. Based on the cultural report prepared for this Initial Study/MND, the AT&T facility will have a less than significant direct or indirect impact to historic properties.

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



Less Than Significant with Mitigation Incorporated. Based on correspondence during tribal consultation, the following is recommended.

3.18b) Mitigation: If human remains or funerary objects are encountered during any activities associated with the project, work 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.

In the event that any pre-contact cultural resources are discovered during project activities, all work 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, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, in order to provide Tribal input. The archaeologist shall complete an isolate/site record for the find and submit this document to the Lead Agency for dissemination to the San Manuel Band of Mission Indians.

If eligible pre-contact resources are discovered, and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan and a Discovery and Monitoring Plan. Drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment. The Lead Agency or designated POC shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.



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

Utilities and Service Systems

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

No Impact. The project will not result in construction of new or expanded water, wastewater, or stormwater facilities. The project is an unmanned wireless communication facility. The proposed project is anticipated to have no such impacts.



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

No Impact. The project will not result in the need for new water supplies. The project is an unmanned wireless communication facility. The proposed project is anticipated to have no such impacts.

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

No Impact. The City of Adelanto liquid waste disposal is primarily handled by the Adelanto Public Utility Authority. The project will not result in a determination by the wastewater treatment provider that it has inadequate capacity, as this is an unmanned telecommunication facility. The proposed project is anticipated to have no such impacts.

- f) **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

No Impact. Solid waste for the City of Adelanto is currently deposited in the Victorville Landfill, which is operated by the County of San Bernardino. The project will not result in expanded capacity needs of the area landfill nor impair the attainment of solid waste reduction goals. The proposed project is anticipated to have no such impacts.

- g) **Does the project comply with federal, state and local management and reduction statutes and regulations related to solid waste?**

No Impact. The project will comply with federal, state and local statutes related to solid waste. The proposed project is anticipated to have no such impacts.



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

Wildfire

- a) **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

Less Than Significant Impacts. Based on the project information, the project will not impair an adopted emergency response plan or emergency evacuation plan. Palmdale Road and Bellflower Street will remain open during construction. Impacts are considered less than significant.

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

Less Than Significant Impacts. Safety precautions will be met when fuels are used for the backup generator. Based on the project information, the project will have a less than significant impact to exacerbate wildfire risks in the area.



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

No Impact. The project would not anticipate the need for additional infrastructure such as roads, fuel breaks, etc. The proposed project is anticipated to have no such impacts.

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

No Impact. Based on the type of project, it will not expose people or structure to significant risks associated with flooding or landslides as a result of runoff. The proposed project is anticipated to have no such impacts.

Public Review Draft



4.0 Initial Environmental Study Form

Project Title: AT&T mono-eucalyptus, CSL05972, Site Name: Guru

Lead Agency Name and Address: City of Adelanto, Development Services, Planning Division
11600 Air Expressway
Adelanto, CA 92301
760-246-2300

Contact Person and Phone Number: Jim Hursh 760-246-2300, ext. 11190

Project Location: The undeveloped property is currently owned by Guru Investments, LLC and is identified by Assessor Parcel Number (APN) 3103-481-05-0000 with a total area of approximately 9 acres (henceforth called “Parent Property”). The proposed AT&T mono-eucalyptus and equipment will be located approximately 290 feet south from the property line to the closest residential area, approximately 600 feet east of Bellflower Street, and approximately 305 feet north of Palmdale Road, in the City of Adelanto, San Bernardino County, California (Project Site). Bellflower Street is a north-south trending road and intersects with east-west trending Palmdale Road to the south. Delicious Road and Highway 395 are located further to the east. The Project Site will be located along the eastern boundary of the parent property (latitude: N34.507805 degrees, longitude: W-117.414900 degrees). The San Bernardino and San Gabriel Mountains are to the south, and the Mojave River is to the east. The project is located in Section 21 of Township 5 North, Range 5 West (San Bernardino Baseline and Meridian) as shown on the Adelanto, California USGS 7.5-minute quadrangle topographic map with an elevation of approximately 3,147 feet above mean sea level. The property has a Zoning designation of Commercial.

General Plan Designation: Commercial

Zoning: Commercial

Description of the Project:

Equipment

The project scope is to construct one (1) seventy-five foot (75') high mono-eucalyptus with a twenty-six foot (26') diameter branch span, within a twenty foot, two inch (20'-2") by thirty-six foot, two inch (36'-2") lease area (730 square feet), surrounded by a new ten foot, eight inch (10'-8") tall CMU wall enclosure with metal security lid. Within the enclosure, AT&T will install one CWIC shelter, utility H-frame with telco panels and fused disconnects, and one 140-gallon backup diesel generator. A metal gate will access the equipment inside the enclosure. Other GPS antenna, electrical panels and meters will also be installed within the enclosure. The area will henceforth be referred to as the Project Site.



Access/trenching

Access to the proposed site is via a twelve foot (12') wide by approximately six hundred-sixty feet (660') non-exclusive vehicular path which will have a gravel base. The access will enter from Bellflower Street to the west. Approximately nine hundred thirty-five feet (935') of electrical and telco trenching will be required from the proposed site westward toward Bellflower Street, then southerly toward Palmdale Road and an existing SCE vault. The trenching will follow the access path. The access area will also include a hammerhead turn around and non-exclusive parking space for maintenance parking.

Construction

Construction access is also proposed from Bellflower Street. A short-term impact of this project will likely be the inconveniences created for short periods of time on traffic flows along Bellflower Street. Construction is estimated to take 6 to 8 weeks, but not continuous during that time. Construction staging for the new mono-eucalyptus will be required. Construction personal vehicles will park on Bellflower Street. Semi-trucks carrying the mono-eucalyptus and equipment will enter and exit from Bellflower Street and will be required to remain within the proposed AT&T access easement. Spoils from the mono-eucalyptus caisson will temporarily be placed adjacent to proposed site and trucked off-site and disposed of by the construction contractor. Dump trucks and concrete trucks will be required to utilize the proposed access easement. Caisson spoils will not remain onsite. Construction will require a crane to place the mono-eucalyptus. The temporary impacts from construction will be restored after construction is complete. Joshua trees located on the property will be avoided.

Surrounding Land Uses and Setting:

The 9-acres parent property is primarily undeveloped level land, with the exception of some graded portions of the property along Bellflower Street and Palmdale Road, and off-road vehicle and pedestrian paths. The property also contains trash and various amounts and debris. The Project Site and trench locations include native vegetation of Creostote Brush as well as non-native forbs and grasses. Drainage is generally toward the east and north, toward the existing drainage to the east. At least two (2) Joshua Trees appear to be located very near the access and trench routes. The closest Joshua Tree to the lease is approximately 200 feet west.

The Project area, located in the high desert - southwest portion of the Mojave Desert, has an arid climate characterized by cool winters and hot summers. With an average annual temperature typically of approximately 62 °F, highs in the summer average 96 °F and lows in the winter averaging 33 °F, and low humidity throughout the year. Average annual precipitation for the Adelanto, California, area is approximately 3.9 inches.

Surrounding areas include:

North: The property approximately 290 feet to the north of the AT&T facility consists of single-family residential uses. Additional residential uses to the northeast and northwest.



- South: Palmdale Road. Property to the south consists of vacant, undeveloped land similar to the Parent Property. The City of Victorville is located south of Palmdale Road.
- East: Property to the east consists of vacant, undeveloped land similar to the Parent Property.
- West: Bellflower Street. Property to the west includes a commercial gas station and additional vacant and undeveloped land.

Bellflower Street is a two laned local street trending north-south in this area, with no curb, gutter or sidewalk in the area of the subject property. Further north on Bellflower are single family homes (approximately 290 feet from the proposed AT&T facility), and the street is improved with curb, gutter and sidewalk, overhead street lighting and underground utilities, sewer and water. This area of Bellflower Street has mature landscaping and landscape irrigation.

Palmdale Road (Highway 18) is a two-laned arterial tending east-west in this area, with left and right turn lanes onto Bellflower Street. Curb, gutter and sidewalks are only located along the commercial gas station area of Palmdale Road. This area of Palmdale Road includes overhead power and telephone lines, street signage, and underground utilities.

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

- City of Adelanto. The project requires compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.
- City of Adelanto. Compliance with City Conditional Use Permit, as necessary.
- Caltrans. Encroachment Permit for any work within Palmdale Road.
- MDAQMD. Permit for backup generator.

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

- Tribal consultation was commenced as part of this Initial Study and MND process. Details of the tribes consulted are included in Sections 3.5 and 3.18.



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

	Aesthetics		Agriculture and Forestry		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				

No potentially significant impacts were found as a result of this Initial Study and Mitigated Negative Declaration



DETERMINATION: On the basis of this initial evaluation:

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

Sandra F. Jacobs (electronic)
 Signature: Prepared by Sandra F. Jacobs, Impact 7G
 Environmental Consultant

September 19, 2022
 Date

James Hirsch (electronic)
 Signature: City of Adelanto Planning Division

September 19, 2022
 Date



INITIAL STUDY ENVIRONMENTAL CHECKLIST

Public Review Draft

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?	17.80.020(e) (3&4)A.5, -B and -C			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings or historic buildings within a scenic highway?	17.80.020(e) (3&4)A.5, -B and -C Photo Simulation			X	
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings?	17.80.020(e) (3&4)A.5, -B and -C Photo Simulation			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?				X	

2. AGRICULTURE AND FORESTRY RESOURCES. Would the project:

a) Convert Prime, Unique or Statewide Importance Farmland to non-agricultural use?	Calif. Ag. Land Evaluation				X
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	Calif. Ag. Land Evaluation				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Calif. Dept. of Forestry & Fire Protection				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Calif. Dept. of Forestry & Fire Protection				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	Calif. Dept. of Forestry & Fire Protection				X

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	Air Resources Control Board		X		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Air Resources Control Board			X	
c) Expose sensitive receptors to substantial pollutant concentrations?				X	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?				X	

4. BIOLOGICAL RESOURCES. Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Biological Evaluation		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Biological Evaluation		X		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?	Biological Evaluation		X		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?	Biological Evaluation			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Biological Evaluation			X	

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other local, regional or state habitat conservation plan?	Biological Evaluation				X
5. CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Cultural resource assessment			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Cultural resource assessment			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?	Native American Consultation		X		
6. ENERGY. Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	City General Plan				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	City General Plan				X
7. GEOLOGY AND SOILS. Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:	Land Use Element				
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.)	Land Use Element				X
ii) Strong seismic ground shaking?	Land Use Element				X
iii) Seismic-related ground failure, including liquefaction?	Land Use Element				X
iv) Landslides?	Land Use Element				X
b) Result in substantial soil erosion or loss of topsoil?	Land Use Element				X

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Land Use Element SB Co. Hazard Maps				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Land Use Element				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Land Use Element				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Land Use Element				X
8. GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	City General Plan			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	City General Plan			X	
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	Hazardous Materials Database			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Hazardous Materials Database			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	Hazardous Materials Database			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	Hazardous Materials Database				X

Issues and Supporting Information	Source	Potentially 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?	Hazardous Materials Database				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	City General Plan				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	City General Plan			X	
10. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?					X
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?					X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would;					
i) result in substantial erosion or siltation on- or off-site?			X		
ii) substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or offsite?				X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X	
d) In flood hazards, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X	

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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11. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	City General Plan and Transp./Circ Element				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	City General Plan and Transp./Circ Element				X

12. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?					X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?					X

13. NOISE. Would the project:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	City General Plan			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?	City General Plan			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people to working in the project area to excessive noise levels.?	City General Plan				X

14. POPULATION AND HOUSING. Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?					X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?					X

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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15. PUBLIC SERVICES. Would the project:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i) Fire protection?					X
ii) Police protection?					X
iii) Schools?					X
iv) Parks?					X
v) Other public facilities?					X

16. RECREATION. Would the project:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?					X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?					X

17. TRANSPORTATION. Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?	City General Plan			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?					X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?					X
d) Result in inadequate emergency access?				X	

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Tribal Consultation			X	
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Tribal Consultation		X		

19. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?					X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?					X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?					X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?					X
e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?					X

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

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

Issues and Supporting Information	Source	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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21. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

5.0 Mitigation Measures and Monitoring Program

The Lead Agency (City of Adelanto) must adopt a mitigation monitoring or reporting program pursuant to Section 21081.6 of the Public Resources Code, California Environmental Quality Statutes, upon approval of a mitigated Negative Declaration. The purpose of the program is to ensure compliance with the required mitigation measures or project revisions during project implementation. Section 21081.6 also requires that mitigation measures be adopted as conditions of approval.

<u>Initial Study Designation</u>	<u>Mitigation Description</u>	<u>Timing</u>	<u>Implementation</u>
3.3a)	<i>Mitigation: Since a Mojave Desert Air Quality Management permit will be required for the backup generator, a Health Risk Assessment (HRA) may be required.</i>	Construction	City of Adelanto
3.4a, b & c)	<p><i>Mitigation Nesting Birds:</i> <i>The surrounding habitat are likely to be used by nesting birds during the breeding season. Due to the potential for birds to nest in the vicinity of this site, including burrowing owls, le Conte's thrasher and loggerhead shrikes, if construction of this site should occur during the bird nesting season a survey should be conducted no more than 7 days prior to the start of work. The nesting season is generally considered February 15- August 30, with peak nesting occurring between March 1 and June 30. If any active nests are found within the work area or the project's zone of influence (generally 100-300 feet), work may need to be postponed, or other avoidance measures may be required to ensure the work does not cause significant impacts to nesting birds.</i></p> <p><i>If an active nest is encountered during the construction by contractors or future maintenance activities, work should stop immediately until a biologist can determine the status of the nest and when work can proceed without risking violation to state or federal laws.</i></p>	Pre- During- and Post- Construction	City of Adelanto
3.4a, b & c)	<p><i>Mitigation General Construction work site measures:</i></p> <ul style="list-style-type: none"> • <i>All vehicles will maintain speeds <15 mph within unpaved areas of the project site.</i> • <i>No new roads shall be constructed other than the proposed access route and all vehicles must use the established access routes.</i> • <i>Crews will contain and remove all trash and debris from the job site before leaving at the end of each workday.</i> • <i>No standing water will be left on site. Any leaks will be fixed immediately to avoid any ponding.</i> 	Pre- During- and Post- Construction	City of Adelanto

3.4a, b & c)	<p><i>Mitigation</i> <i>Sensitive Species measures:</i></p> <ul style="list-style-type: none"> • <i>A qualified biologist will conduct a preconstruction survey for special-status biological resources (desert tortoise and burrowing owls) no more than 7 days prior to the start of work. If any special-status wildlife or their sign (scat, active burrows, tracks, etc.) are observed, the biologist will be present during construction and/or develop a plan that best avoids impacts to any sensitive species.</i> • <i>A biologist will provide an Environmental Awareness Training for all personnel prior to the start of any ground disturbing activities.</i> • <i>If any sign of desert tortoise are found in the area during the preconstruction survey, a qualified biologist will be on site for the duration of the project to ensure no take of the species occurs. Additional avoidance measures will be prescribed by the biologist based on the circumstances of the observations.</i> • <i>If a desert tortoise is encountered, work will stop until the on-site monitor determines that it is safe to resume work without impacting the tortoise.</i> • <i>Crew will check for desert tortoise underneath parked vehicles/equipment each time a piece of equipment is moved.</i> 	Pre- During- and Post- Construction	City of Adelanto
3.4a, b & c)	<p><i>Mitigation</i> <i>Western Drainage Feature:</i> <i>It is highly recommended that a regulatory analysis of the small erosional feature to the west of the communication tower be performed by a qualified regulatory specialist to determine if special permitting or avoidances are required.</i></p>	Pre- During- and Post- Construction	City of Adelanto
3.4a, b & c)	<p><i>Mitigation</i> <i>Best Management Practices:</i> <i>The adjacent drainage will need to be avoided and appropriate BMPs should be followed including, but not limited to:</i></p> <ul style="list-style-type: none"> • <i>All work should be confined to the smallest area possible.</i> • <i>No ground disturbing work should be conducted during, or immediately prior to, a rain event.</i> • <i>Work areas should be clearly delineated with flagging or temporary fencing.</i> • <i>All stockpiled soils should be encircled with straw wattles or silt fencing to prevent run off.</i> • <i>No refueling of equipment shall occur on site.</i> 	Pre- During- and Post- Construction	City of Adelanto
3.10 c) i)	<p><i>Mitigation: The contractor will be required to implement Best Management Practices, as necessary.</i></p>	During Construction	City of Adelanto

<p>3.5c) & 3.18 b)</p>	<p><i>3.5c) & 3.18b) Mitigation: If human remains or funerary objects are encountered during any activities associated with the project, work 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.</i></p> <p><i>Mitigation: In the event that any pre-contact cultural resources are discovered during project activities, all work 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, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, in order to provide Tribal input. The archaeologist shall complete an isolate/site record for the find and submit this document to the Lead Agency for dissemination to the San Manuel Band of Mission Indians.</i></p> <p><i>Mitigation: If eligible pre-contact resources are discovered, and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan and a Discovery and Monitoring Plan. Drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment. The Lead Agency or designated POC shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.</i></p>	<p>During Construction</p>	<p>City of Adelanto</p>
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6.0 Source Documents

1.	City of Adelanto General Plan and Elements. (Not Attached)
2.	General Biological Evaluation, December 30, 2021. (Attached)
3.	Cultural Resources Research and Field Survey February 6, 2022. (Attached)
4.	Native American Consultation. January 12, 2022. (Attached)
5.	Flood Insurance Rate Maps. (Attached)
6.	Geotracker Hazardous Materials Database (Attached)
7.	Photo simulations (Attached)

7.0 Comments and Response to Comments

Pending public circulation.

8.0 Consultant Qualifications

Ms. Sandra F. Jacobs is an environmental consultant to Impact 7G. She is an Environmental Professional with over 30 years of experience in CEQA and NEPA document preparation, SHPO concurrence, environmental transaction analyses (Phase 0), Phase I and II Environmental Site Assessments, Caltrans Preliminary Environmental Survey's, as well as site planning, permit processing, entitlement and governmental relations. She possesses a broad technical background. She has managed environmental and planning projects in both the public and private sector. Ms. Jacobs has completed over two thousand (2,000) environmental assessments and hundreds of CEQA/NEPA documents and zoning entitlements for clients. Some of her successful CEQA documents include:

- ❑ Phase I ESA's for over 2,000 telecommunication sites in California and Hawaii.
- ❑ Mitigated Negative Declaration, Victorville, CA, AT&T telecom tower 2022.
- ❑ Mitigated Negative Declaration, Laguna Beach ASL (Alternative Sleeping Location) Project, Laguna Beach, CA 2020
- ❑ CEQA Exemption Sewer Lift Station, Laguna Beach, CA, 2020
- ❑ Mitigated Negative Declaration, Mitigation Monitoring, Regulatory Permitting, 5-year Annual Plan, San Ramon Canyon Storm Drain, City of Rancho Palos Verdes, Los Angeles County, 2010-2015.
- ❑ Mitigated Negative Declaration, Laguna SOCWA Lift Station Rehabilitation and Sewer Relocation, City of Laguna Beach, Orange County, 2014.
- ❑ Caltrans Preliminary Environmental Survey, Rancho Road Rehabilitation, City of Westminster, Orange County, 2014.
- ❑ Mitigated Negative Declaration, Bastanchury Creek Rehabilitation, City of Fullerton, Orange County, 2009 - 2010.
- ❑ Mitigated Negative Declaration, Esplanade Road Improvements, Redondo Beach, Los Angeles County, 2009.
- ❑ Mitigated Negative Declaration, WMWD Solar Power Project, Riverside County, 2008
- ❑ Mitigated Negative Declaration, Lake Turner Solar Power Project, San Diego County, 2008
- ❑ Mitigated Negative Declaration, McCarrell Canyon Storm Drain Project, City of Rancho Palos Verdes, 2007-2009.
- ❑ Mitigated Negative Declaration, Canyon Acres Storm Drain Project, and Permit Processing, City of Laguna Beach, 2005-2006.
- ❑ Mitigated Negative Declaration, City of Laguna Beach Urban Runoff Diversion Program, City of Laguna Beach, 2005.
- ❑ Mitigated Negative Declaration, Laguna Beach Festival of Arts Storm Drain Project, City of Laguna Beach, 2003.
- ❑ Mitigated Negative Declaration, Laguna Beach 8th Street Storm Drain Project, City of Laguna Beach, 2004
- ❑ Mitigated Negative Declaration/Finding of No Significant Impact, Laguna Beach City Sewer Line Reconstruction and Manhole Rehabilitation Program, City of Laguna Beach, 2003.
- ❑ Mitigated Negative Declaration, Juanita Way Storm Drain, City of Laguna Beach, 2004.

- Mitigated Negative Declaration, North Coast Interceptor Project, City of Laguna Beach, 2003.
- Mitigated Negative Declaration, Nye's Place/Shaws Cove Project, City of Laguna Beach, 2003.
- EIR for the Heisler Park Renovation and Rehabilitation, City of Laguna Beach, 2005-2006.
- Program EIR for the Laguna Canyon Storm Drain Channel Improvements, City of Laguna Beach, 1999.
- Addendum EIR for the Laguna Canyon Storm Drain Channel Improvements, City of Laguna Beach, 1999.
- Addendum #2 EIR for the Laguna Canyon Storm Drain Channel Improvements, City of Laguna Beach, 2001.
- EIR for the Blue Bird Canyon Emergency Access Road, City of Laguna Beach, Orange County, 1998.

Professional Membership/Registrations

Environmental Professional (formerly Environmental Assessor)

American Planning Association

Association of Environmental Professionals

California Women's Leadership Association

Association of California Water Agencies

California Association of Sanitation Agencies

Resume attached.



RESUME AND QUALIFICATIONS

Saundra F. Jacobs, Environmental Professional, CEQA/NEPA Specialist

Education:

BA, University California Santa Barbara, Environmental Studies, Geography, 1986
AA, Santa Barbara Community College, Geology, 1982

Technical Expertise

CEQA/NEPA Documentation (EIR/EIS/ND/MND/EA)
Environmental Site Assessments
Preliminary Environmental Assessment (Caltrans)
Land Use Planning, Permitting, Entitlement
Property Disclosure
Government Relations
Project Management

Experience

Ms. Saundra F. Jacobs is the Managing Principal of SxJ Group. She is an Environmental Professional with over 30 years of experience in CEQA and NEPA document preparation, SHPO concurrence, environmental transaction analyses (Phase 0), Phase I and II Environmental Site Assessments, Caltrans Preliminary Environmental Survey's, as well as site planning, permit processing, entitlement and governmental relations. She possesses a broad technical background. She has managed environmental and planning projects in both the public and private sector. Ms. Jacobs has completed over two thousand (2,000) environmental assessments and hundreds of CEQA/NEPA documents and zoning entitlements for clients. Prior to starting SxJ Group in 2022, Ms. Jacobs retired in 2021 as President of her own site acquisition, engineering and environmental services firm, a certified DBE/WBE since 1991.

Selected Projects and Clients

- ❑ Phase I ESA's for over 2,000 telecommunication sites in California and Hawaii.
- ❑ Mitigated Negative Declaration, Laguna Beach ASL (Alternative Sleeping Location) Project, Laguna Beach, CA 2020
- ❑ CEQA Exemption Sewer Lift Station, Laguna Beach, CA, 2020
- ❑ Mitigated Negative Declaration, Mitigation Monitoring, Regulatory Permitting, 5-year Annual Plan, San Ramon Canyon Storm Drain, City of Rancho Palos Verdes, Los Angeles County, 2010-2015.
- ❑ Mitigated Negative Declaration, Laguna SOCWA Lift Station Rehabilitation and Sewer Relocation, City of Laguna Beach, Orange County, 2014.
- ❑ Caltrans Preliminary Environmental Survey, Rancho Road Rehabilitation, City of Westminster, Orange County, 2014.

- ❑ Mitigated Negative Declaration, Bastanchury Creek Rehabilitation, City of Fullerton, Orange County, 2009 - 2010.
- ❑ Mitigated Negative Declaration, Esplanade Road Improvements, Redondo Beach, Los Angeles County, 2009.
- ❑ Mitigated Negative Declaration, WMWD Solar Power Project, Riverside County, 2008
- ❑ Mitigated Negative Declaration, Lake Turner Solar Power Project, San Diego County, 2008
- ❑ Mitigated Negative Declaration, McCarrell Canyon Storm Drain Project, City of Rancho Palos Verdes, 2007-2009.
- ❑ Mitigated Negative Declaration, Canyon Acres Storm Drain Project, and Permit Processing, City of Laguna Beach, 2005-2006.
- ❑ Mitigated Negative Declaration, City of Laguna Beach Urban Runoff Diversion Program, City of Laguna Beach, 2005.
- ❑ Mitigated Negative Declaration, Laguna Beach Festival of Arts Storm Drain Project, City of Laguna Beach, 2003.
- ❑ Mitigated Negative Declaration, Laguna Beach 8th Street Storm Drain Project, City of Laguna Beach, 2004
- ❑ Mitigated Negative Declaration/Finding of No Significant Impact, Laguna Beach City Sewer Line Reconstruction and Manhole Rehabilitation Program, City of Laguna Beach, 2003.
- ❑ Mitigated Negative Declaration, Juanita Way Storm Drain, City of Laguna Beach, 2004.
- ❑ Mitigated Negative Declaration, North Coast Interceptor Project, City of Laguna Beach, 2003.
- ❑ Mitigated Negative Declaration, Nye's Place/Shaws Cove Project, City of Laguna Beach, 2003.
- ❑ EIR for the Heisler Park Renovation and Rehabilitation, City of Laguna Beach, 2005-2006.
- ❑ Program EIR for the Laguna Canyon Storm Drain Channel Improvements, City of Laguna Beach, 1999.
- ❑ Addendum EIR for the Laguna Canyon Storm Drain Channel Improvements, City of Laguna Beach, 1999.
- ❑ Addendum #2 EIR for the Laguna Canyon Storm Drain Channel Improvements, City of Laguna Beach, 2001.
- ❑ EIR for the Blue Bird Canyon Emergency Access Road, City of Laguna Beach, Orange County, 1998.

Professional Membership/Registrations

Environmental Professional (formerly Environmental Assessor)

American Planning Association, member

Association of Environmental Professionals, member

California Women's Leadership Association, member

Association of California Water Agencies, member

California Association of Sanitation Agencies, member

Industrial Environmental Coalition of Orange County, member
Independent Special Districts of Orange County, Board of Directors, Executive Committee
California Special Districts Association, Member
Urban Water Institute, member
Orange County Water Association, member
Santiago Aqueduct Committee, Board of Directors, Alternate

Elected Positions

Santa Margarita Water District, Board of Directors

References

1997-2020

Environmental Consulting

City of Laguna Beach

CEQA, MNDs, EIR's

Dave Shissler, PE, Water Quality

dshissler@lagunabeachcity.net

Natalie Chan, Assistant City Engineer

nchan@lagunabeachcity.net

Hannah Johnson, Project Manager

hjohnson@lagunabeachcity.net

2010-2020

Environmental Consulting

City of Rancho Palos Verdes

CEQA, Mitigation Monitoring, San Ramon Canyon storm drain. McCarrell Canyon storm drain

Ron Dragoo, City Engineer

rond@rpvca.gov

2007-2015

Environmental Consulting

City of Westminster

Caltrans PES

Theresa Tran, PE, City Engineer

2010-2015

Environmental Consulting

City of Fountain Valley

CEQA, Caltrans PES

Alex Salazar, 714-593-4516

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SITE NUMBER: CSL05972
SITE NAME: GURU

PACE#: MRLOS079069 | FA#: 13025526 | USID#: 309836

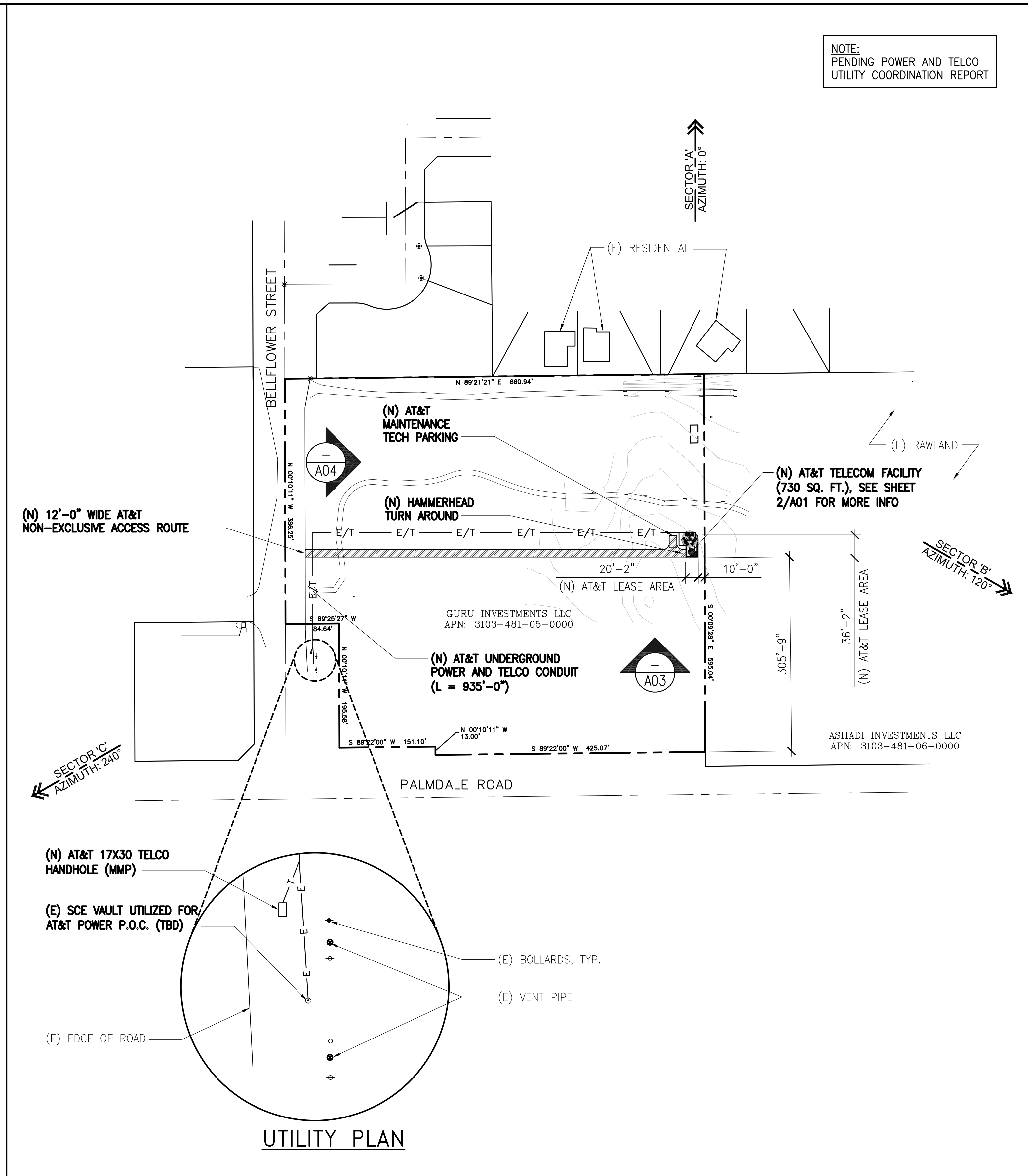
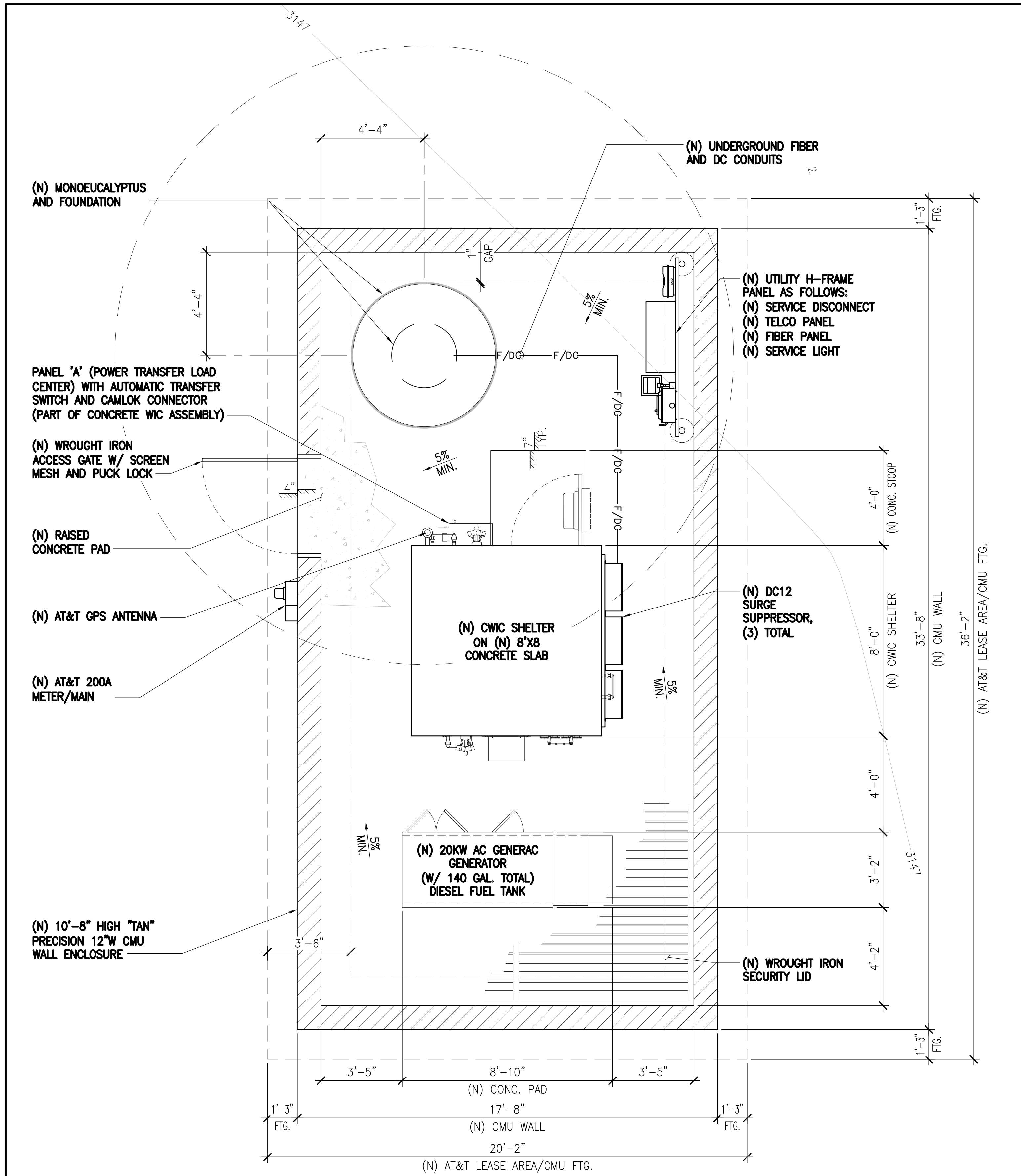
A/E DOCUMENT REVIEW STATUS

Status Code											
1	Accepted – With minor or no comments, construction may proceed										
2	Not Accepted – Please resolve comments and resubmit										
4	Review not required. Construction may proceed.										
Acceptance does not constitute approval of design details, calculations, analysis, test methods or materials developed or selected by the subcontractor and does not relieve subcontractor from full compliance obligations.											
Reviewed	<table border="1"> <tr> <th>ENG</th> <th>CONST</th> <th></th> <th></th> <th></th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	ENG	CONST								
ENG	CONST										
Status By	Date										

DRAWING INDEX (ZONING)	REV.	DIRECTIONS	PROJECT INFORMATION
AA-CSL05972-T01 TITLE SHEET AA-CSL05972-A01 SITE/UTILITY PLAN AND EQUIPMENT LAYOUT PLAN AA-CSL05972-A02 ANTENNA LAYOUT PLAN AND SCHEDULE AA-CSL05972-A03 ELEVATION AA-CSL05972-A04 ELEVATION AA-CSL05972-B01 TOPOGRAPHIC SURVEY (FOR REFERENCE ONLY) AA-CSL05972-B02 TOPOGRAPHIC SURVEY (FOR REFERENCE ONLY) AA-CSL05972-B03 TOPOGRAPHIC SURVEY (FOR REFERENCE ONLY) AA-CSL05972-B04 TOPOGRAPHIC SURVEY (FOR REFERENCE ONLY)	0 0 0 0 0 1 1 1 1	DRIVING DIRECTIONS FROM AT&T WIRELESS, TUSTIN FROM AT&T TUSTIN OFFICE (1452 EDINGER AVENUE, 3RD FLOOR, TUSTIN, CA 92780): 1. HEAD SOUTHEAST ON EDINGER AVE TOWARD RED HILL AVE 2. MAKE A U-TURN 3. TURN LEFT ONTO DEL AMO AVE 4. TAKE THE RAMP ON THE LEFT AND FOLLOW SIGNS FOR CA-55 NORTH 5. AT EXIT 15, HEAD ON THE RAMP RIGHT AND FOLLOW SIGNS FOR KATELLA AVE 6. BEAR LEFT ONTO ROAD, THEN IMMEDIATELY BEAR LEFT ONTO ROAD 7. TAKE THE RAMP ON THE RIGHT FOR CA-55 NORTH AND HEAD TOWARD RIVERSIDE 8. TAKE THE RAMP ON THE RIGHT FOR CA-91 EAST AND HEAD TOWARD RIVERSIDE 9. AT EXIT 50, HEAD ON THE RAMP RIGHT AND FOLLOW SIGNS FOR MAIN ST 10. TAKE THE RAMP ON THE RIGHT 11. MERGE ONTO CA-91 E 12. KEEP STRAIGHT TO GET ONTO I-215 N 13. KEEP STRAIGHT TO GET ONTO I-15 N 14. AT EXIT 141, HEAD RIGHT ON THE RAMP FOR US-395 TOWARD ADELANTO / BISHOP 15. KEEP STRAIGHT TO GET ONTO RAMP 16. BEAR RIGHT ONTO US-395 N / US HIGHWAY 395 17. TURN LEFT ONTO CA-18 / PALMDALE RD 18. ARRIVE AT CA-18 / PALMDALE RD ON THE LEFT	SCOPE OF WORK: AN UNMANNED TELECOMMUNICATIONS FACILITY INCLUDING THE FOLLOWING: 1. (1) 75'H 3-LIMB MONOEUCALYPTUS 2. (9) 8'H PANEL ANTENNAS MOUNTED ON (N) MONOEUCALYPTUS 3. (3) 31"H PANEL ANTENNAS MOUNTED ON (N) MONOEUCALYPTUS 4. (36) REMOTE RADIO UNITS AND (6) DC9 SURGE SUPPRESSORS AT ANTENNA LEVEL 5. 10'-8"H CMU ENCLOSURE WITH METAL SECURITY LID 6. (1) CWIC SHELTER WITHIN (N) CMU ENCLOSURE 7. (1) 20KW AC GENERAC GENERATOR (W/ 140 GAL. TOTAL) DIESEL FUEL TANK 8. (1) GPS ANTENNA AT GRADE LEVEL 9. POWER AND TELCO PANELS 10. POWER, TELCO AND FIBER/COAX RUNS
		VICINITY MAP	SITE ADDRESS: PALMDALE ROAD ADELANTO, CA 92301 PROPERTY OWNER: GURU INVESTMENTS LLC 11305 PALMDALE RD. ADELANTO, CA 92301 CONTACT: KAUSHIK (KEVIN) PATEL PHONE: (951) 316-9924 kcal1983@gmail.com
			APPLICANT: AT&T MOBILITY SERVICES 1452 EDINGER AVE., 3RD FLR. TUSTIN, CA 92780 SITE ACQUISITION: CRYSTAL RODRIGUES-MARAMBA COMPANY: COASTAL BUSINESS GROUP PHONE: (949) 336-1550 ZONING: CRYSTAL RODRIGUES-MARAMBA COMPANY: COASTAL BUSINESS GROUP PHONE: (949) 336-1550 RF ENGINEER: TARIK QUAZZANI COMPANY: AT&T PHONE: (505) 730-4726 CONSTRUCTION: RON VANDERWAL COMPANY: BECHTEL COMMUNICATIONS PHONE: (714) 343-0931 POWER COMPANY: TBD TEL COMPANY: TBD
CODE COMPLIANCE			BUILDING SUMMARY: OCCUPANCY: U (UNMANNED TELECOMMUNICATIONS) TYPE OF CONSTRUCTION: V-B LEASE AREA: 730 SQ.FT. ZONING: COMMERCIAL LAND USE: VACANT LAND APN: 3103-481-05-0000 JURISDICTION: CITY OF ADELANTO ELEVATION (NAVD88): 3147 FT (AMSL) LATITUDE (NAD83): N34°30'28.10" (34.507805°) LONGITUDE (NAD83): W117°24'53.64" (-117.414900°) ACCESSIBILITY REQ'D: UNMANNED TELECOMMUNICATIONS FACILITY AND NOT FOR HUMAN HABITATION. HANDICAPPED ACCESS NOT REQUIRED.
** NOTE: ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THESE CODES. NOTHING IN THESE PLANS IS TO BE CONSTRUED TO PERMIT WORK NOT CONFORMING TO THESE CODES.			
1. 2019 CALIFORNIA ADMINISTRATIVE CODE (CAC) 2. 2019 CALIFORNIA BUILDING CODE (CBC), VOLUMES 1, AND 2 3. 2019 CALIFORNIA ELECTRICAL CODE 4. 2019 CALIFORNIA MECHANICAL CODE (CMC) 5. 2019 CALIFORNIA ENERGY CODE 6. 2019 CALIFORNIA FIRE CODE (CFC) 7. 2019 CALIFORNIA GREEN CODE 8. 2019 CALIFORNIA REFERENCES STANDARDS CODE			

DCI PACIFIC A E C WORKS <small>ARCHITECTURE ENGINEERING CONSULTING 26 EXECUTIVE PARK SUITE 170 IRVINE CA 92614</small>	CSL05972 GURU PACE#: MRLOS079069 FA#: 13025526 USID#: 309836 PALMDALE ROAD ADELANTO, CA 92301	 <small>1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780</small>	<table border="1"> <tr> <th>NO.</th> <th>DATE</th> <th>REVISIONS</th> <th>BY</th> <th>CHK</th> <th>APP'D</th> </tr> <tr> <td>0</td> <td>10/18/21</td> <td>ISSUED FOR ZONING PERMIT</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> <tr> <td>A</td> <td>09/03/21</td> <td>ISSUED FOR ZD REVIEW AND COMMENTS</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> </table>	NO.	DATE	REVISIONS	BY	CHK	APP'D	0	10/18/21	ISSUED FOR ZONING PERMIT	RF	BOK	DKD	A	09/03/21	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD		AT&T MOBILITY TUSTIN, CA TITLE SHEET <table border="1"> <tr> <th>JOB NO</th> <th>DRAWING NUMBER</th> <th>REV.</th> </tr> <tr> <td></td> <td>AA-CSL05972-T01</td> <td>0</td> </tr> </table>	JOB NO	DRAWING NUMBER	REV.		AA-CSL05972-T01	0
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	AA-CSL05972-T01	0																											
			SCALE AS SHOWN	DESIGNED	DRAWN																								

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NOTE:
PENDING POWER AND TELCO
UTILITY COORDINATION REPORT

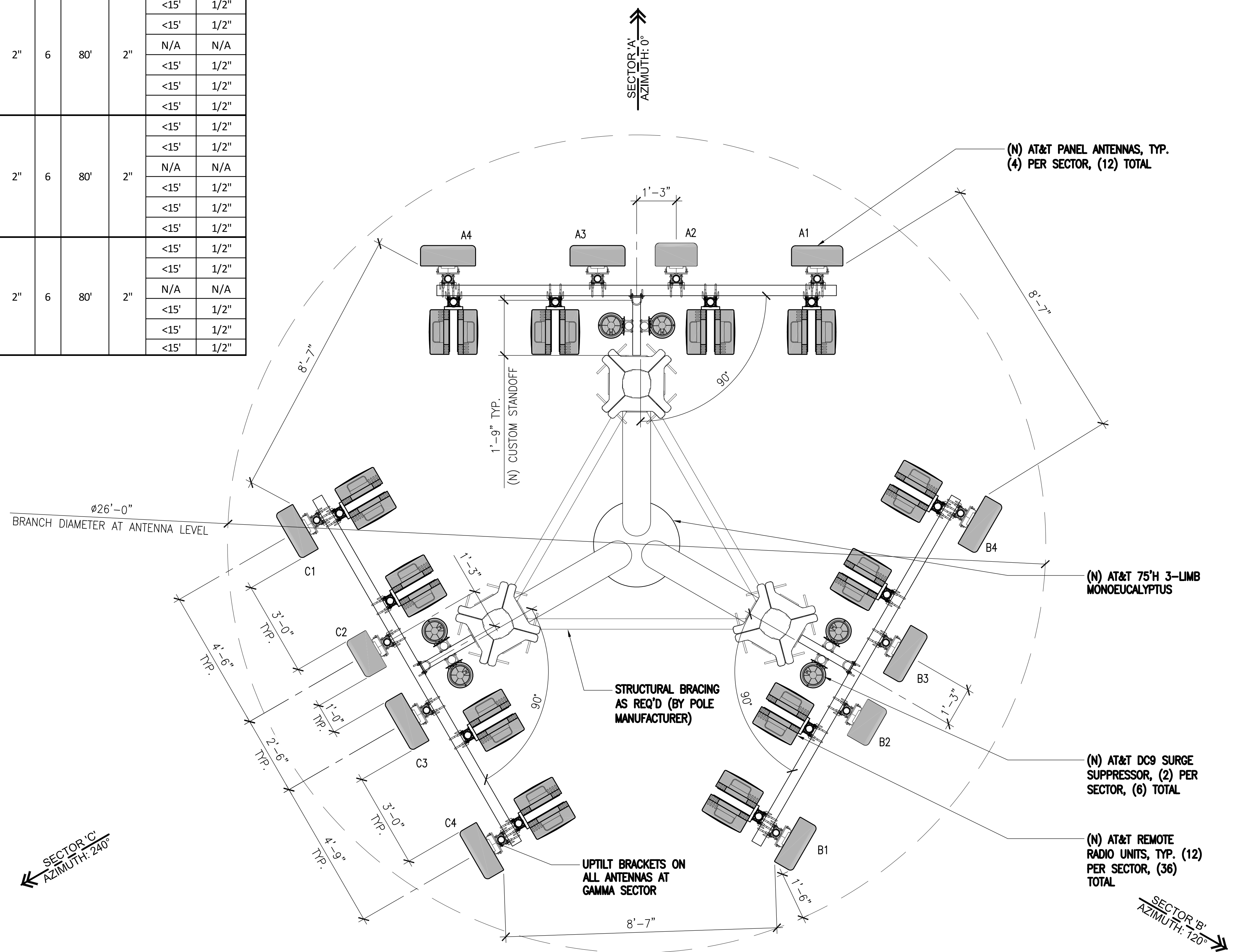
EQUIPMENT LAYOUT PLAN SCALE: 3/8" = 1'-0" 	2 SITE PLAN SCALE: 1" = 100'-0" 																			
DCI PACIFIC A/E/C WORKS <small>ARCHITECTURE ENGINEERING CONSULTING 26 EXECUTIVE PARK SUITE 170 IRVINE CA 92614</small>	CSL05972 GURU PACE#: MRLOS079069 FA#: 13025526 USID#: 309836 PALMDALE ROAD ADELANTO, CA 92301	 1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780																		
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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;"> AT&T MOBILITY TUSTIN, CA </td> </tr> <tr> <td colspan="2" style="text-align: center;"> SITE/UTILITY PLAN AND EQUIPMENT LAYOUT PLAN </td> </tr> <tr> <td style="width: 50%;">JOB NO</td> <td style="width: 50%;">DRAWING NUMBER</td> </tr> <tr> <td></td> <td style="text-align: center;">AA-CSL05972-A01</td> </tr> <tr> <td></td> <td style="text-align: right;">REV. 0</td> </tr> </table>	AT&T MOBILITY TUSTIN, CA		SITE/UTILITY PLAN AND EQUIPMENT LAYOUT PLAN		JOB NO	DRAWING NUMBER		AA-CSL05972-A01		REV. 0								
AT&T MOBILITY TUSTIN, CA																				
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CSL05972 ANTENNA & RRU SCHEDULE

SECTOR	POSITION	PANEL ANTENNAS					REMOTE RADIO UNITS (RRU'S)			CABLES								
		TECHNOLOGY	MFR	MODEL NO.	AZIMUTH	RAD CENTER	MODEL NO.	QTY	UP OR DOWN	FIBER TRUNKS			DC TRUNKS			JUMPERS		
										QTY	LENGTH	DIA	QTY	LENGTH	DIA	LENGTH	DIA	
ALPHA	A1	LTE	COMMSCOPE	NNH4-65C-R6-V3	0	66'-0"	RRUS 4449 B5/B12	1	UP	2	80'	2"	6	80'	2"	<15'	1/2"	
						RRUS 8843 B2/B66A	1	UP	<15'							1/2"		
	A2	5G	ERICSSON	AIR 6449 N77D	0	68'-9"	N/A	N/A	N/A							N/A	N/A	N/A
	A3	LTE	CCI	OPA65R-BU8DA-K	0	66'-0"	RRUS 4478 B14	1	UP							<15'	1/2"	
	A4	LTE	CCI	OPA65R-BU8DA-K	0	66'-0"	RRUS 2012 B29	1	UP							<15'	1/2"	
						RRUS 4415 B30	1	UP	<15'	1/2"								
BETA	B1	LTE	COMMSCOPE	NNH4-65C-R6-V3	120	66'-0"	RRUS 4449 B5/B12	1	UP	2	80'	2"	6	80'	2"	<15'	1/2"	
						RRUS 8843 B2/B66A	1	UP	<15'							1/2"		
	B2	5G	ERICSSON	AIR 6449 N77D	120	68'-9"	N/A	N/A	UP							N/A	N/A	
	B3	LTE	CCI	OPA65R-BU8DA-K	120	66'-0"	RRUS 4478 B14	1	N/A							<15'	1/2"	
	B4	LTE	CCI	OPA65R-BU8DA-K	120	66'-0"	RRUS 2012 B29	1	UP							<15'	1/2"	
						RRUS 4415 B30	1	UP	<15'	1/2"								
GAMMA (UPTILT)	C1	LTE	COMMSCOPE	NNH4-65C-R6-V3	240	66'-0"	RRUS 4449 B5/B12	1	UP	2	80'	2"	6	80'	2"	<15'	1/2"	
						RRUS 8843 B2/B66A	1	UP	<15'							1/2"		
	C2	5G	ERICSSON	AIR 6449 N77D	240	68'-9"	N/A	N/A	N/A							N/A	N/A	
	C3	LTE	CCI	OPA65R-BU8DA-K	240	66'-0"	RRUS 4478 B14	1	UP							<15'	1/2"	
	C4	LTE	CCI	OPA65R-BU8DA-K	240	66'-0"	RRUS 2012 B29	1	UP							<15'	1/2"	
						RRUS 4415 B30	1	UP	<15'	1/2"								

NOTES:
 1. PAINT ALL NEW ANTENNAS, SURGE SUPPRESSORS, RRU'S AND MOUNTING BRACKETS GREEN TO MATCH FOLIAGE.
 2. INSTALL FAUX FOLIAGE SLEEVE ON ALL NEW PANEL ANTENNAS.



ANTENNA LAYOUT PLAN & SCHEDULE

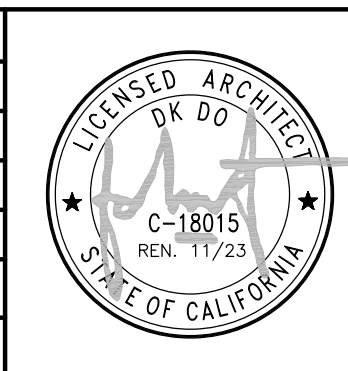
DCI PACIFIC
 A|E|C WORKS
 ARCHITECTURE | ENGINEERING | CONSULTING
 26 EXECUTIVE PARK | SUITE 170
 IRVINE | CA 92614

CSL05972
 GURU
 PACE#: MRLOS079069 | FA#: 13025526 | USID#: 309836
 PALMDALE ROAD
 ADELANTO, CA 92301

1452 EDINGER AVENUE, 3RD FLOOR
 TUSTIN, CA 92780

NO.	DATE	REVISIONS	BY	CHK	APP'D
0	10/18/21	ISSUED FOR ZONING PERMIT	RF	BOK	DKD
A	09/03/21	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD

SCALE AS SHOWN DESIGNED DRAWN

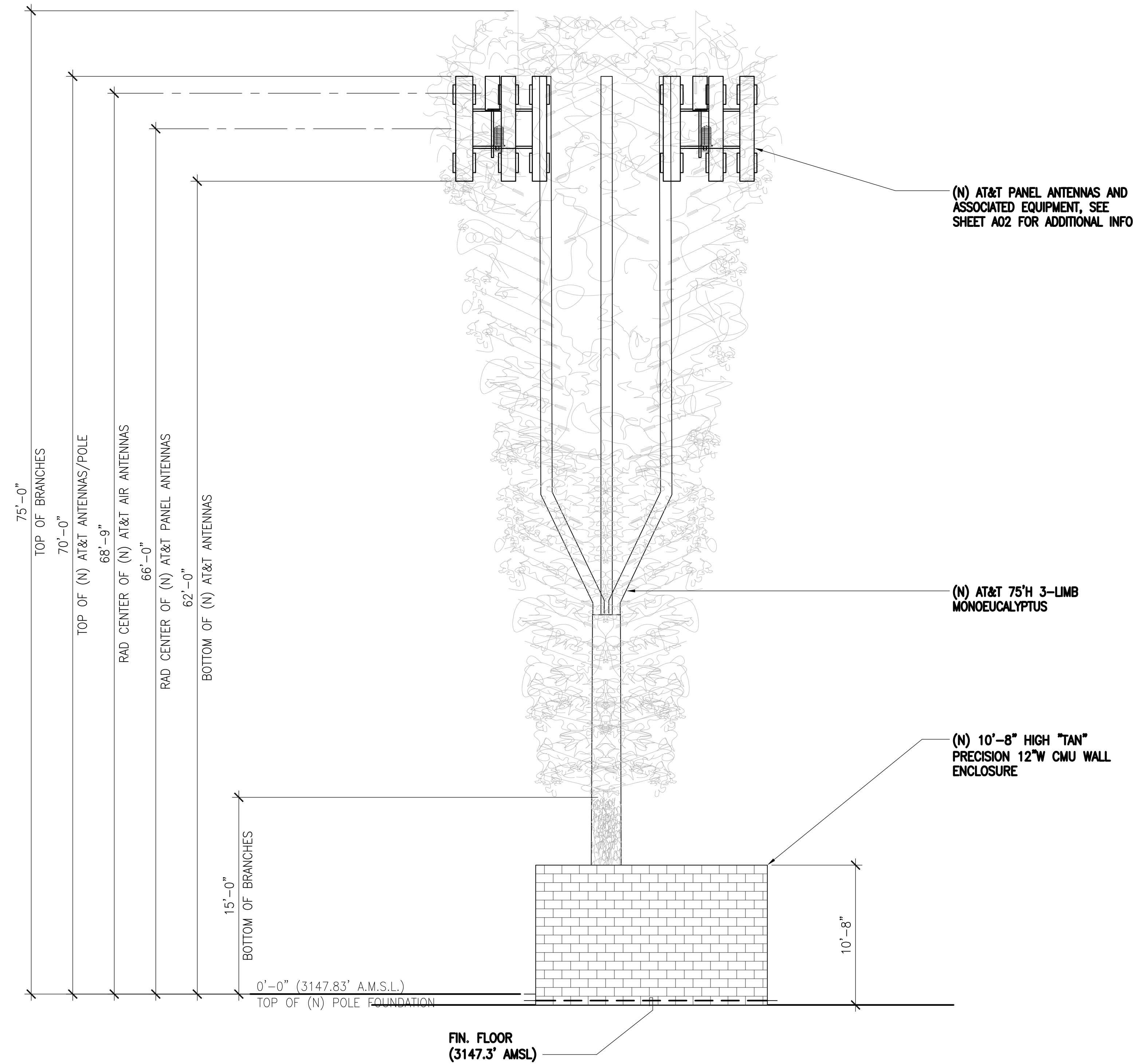


AT&T MOBILITY
 TUSTIN, CA
ANTENNA LAYOUT PLAN AND SCHEDULE
 JOB NO. DRAWING NUMBER REV.
 AA-CSL05972-A02 0

SCALE: 1/2" = 1'-0"
 NORTH 1

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- NOTES:
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 2. INSTALL FAUX FOLIAGE SLEEVE ON ALL NEW PANEL ANTENNAS.



SOUTH ELEVATION

SCALE: 3/16" = 1'-0" 0 1' 2' 5' **1**

DCI PACIFIC
A/E/C WORKS

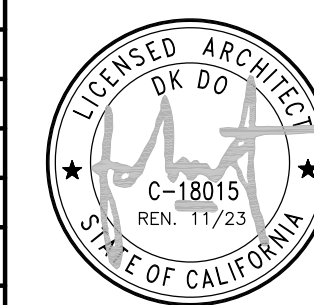
ARCHITECTURE | ENGINEERING | CONSULTING
26 EXECUTIVE PARK | SUITE 170
IRVINE | CA 92614

CSL05972
GURU
PACE#: MRLOS079069 | FA#: 13025526 | USID#: 309836
PALMDALE ROAD
ADELANTO, CA 92301



NO.	DATE	REVISIONS	BY	CHK	APP'D
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SCALE AS SHOWN DESIGNED DRAWN



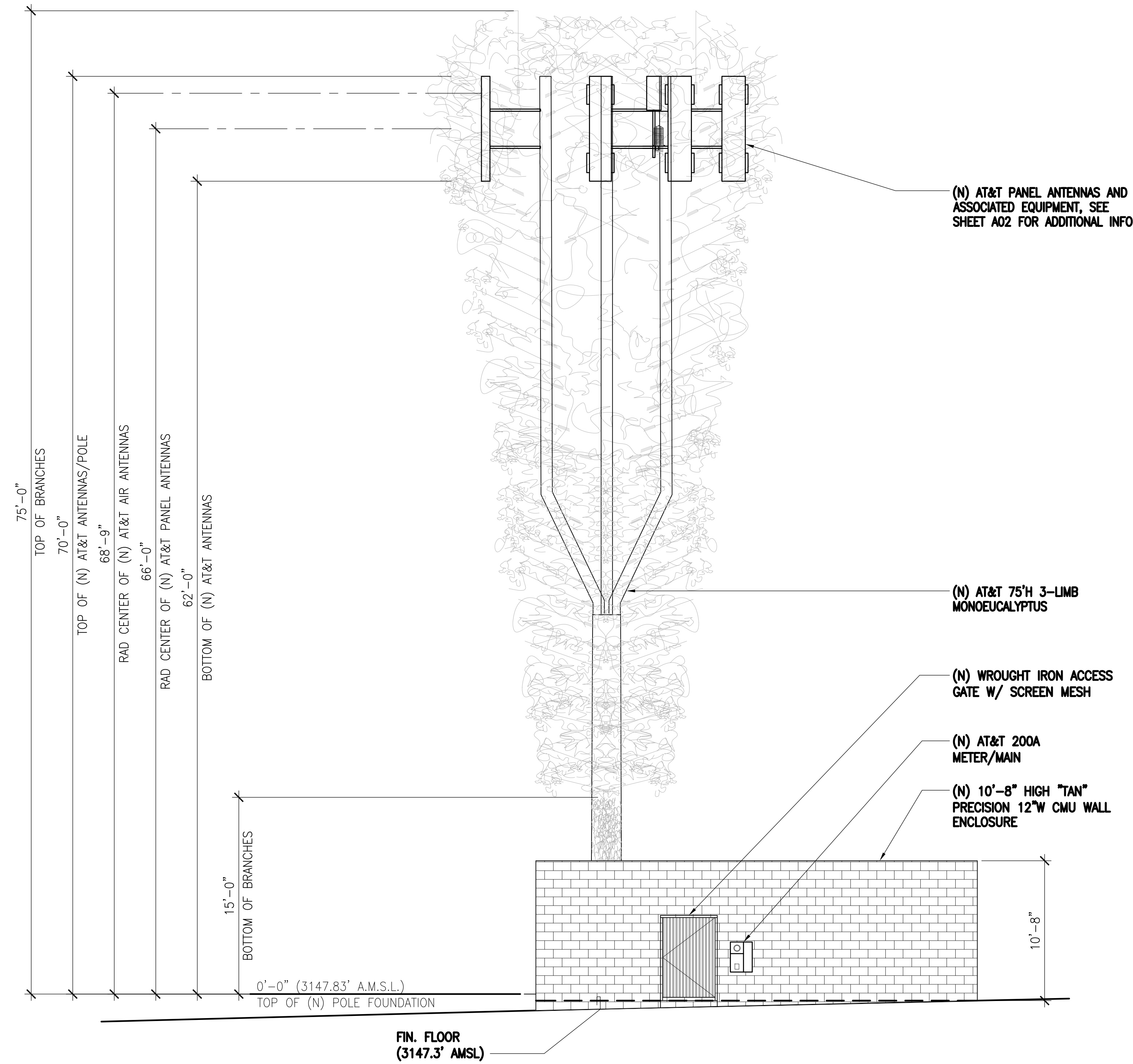
AT&T MOBILITY
TUSTIN, CA

ELEVATION

JOB NO.	DRAWING NUMBER	REV.
	AA-CSL05972-A03	0

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WEST ELEVATION

SCALE: 1/4" = 1'-0"
 0 1' 2' 4' **1**

DCI PACIFIC
 A|E|C WORKS

ARCHITECTURE | ENGINEERING | CONSULTING
 26 EXECUTIVE PARK | SUITE 170
 IRVINE | CA 92614

CSL05972
 GURU

PACE#: MRLOS079069 | FA#: 13025526 | USID#: 309836

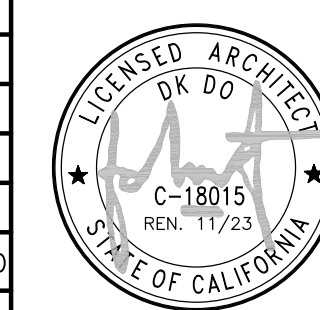
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 ADELANTO, CA 92301



1452 EDINGER AVENUE, 3RD FLOOR
 TUSTIN, CA 92780

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A	09/03/21	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD

SCALE AS SHOWN DESIGNED DRAWN



AT&T MOBILITY
 TUSTIN, CA

ELEVATION

JOB NO. DRAWING NUMBER REV.
 AA-CSL05972-A04 0

OWNER'S NAME: GURU INVESTMENTS LLC
 ASSESSOR'S PARCEL NUMBER(S) 3103-481-05-0000

PROPERTY LEGAL DESCRIPTION
 (WAITING FOR TITLE)

TITLE REPORT NOTES
 (WAITING FOR TITLE)

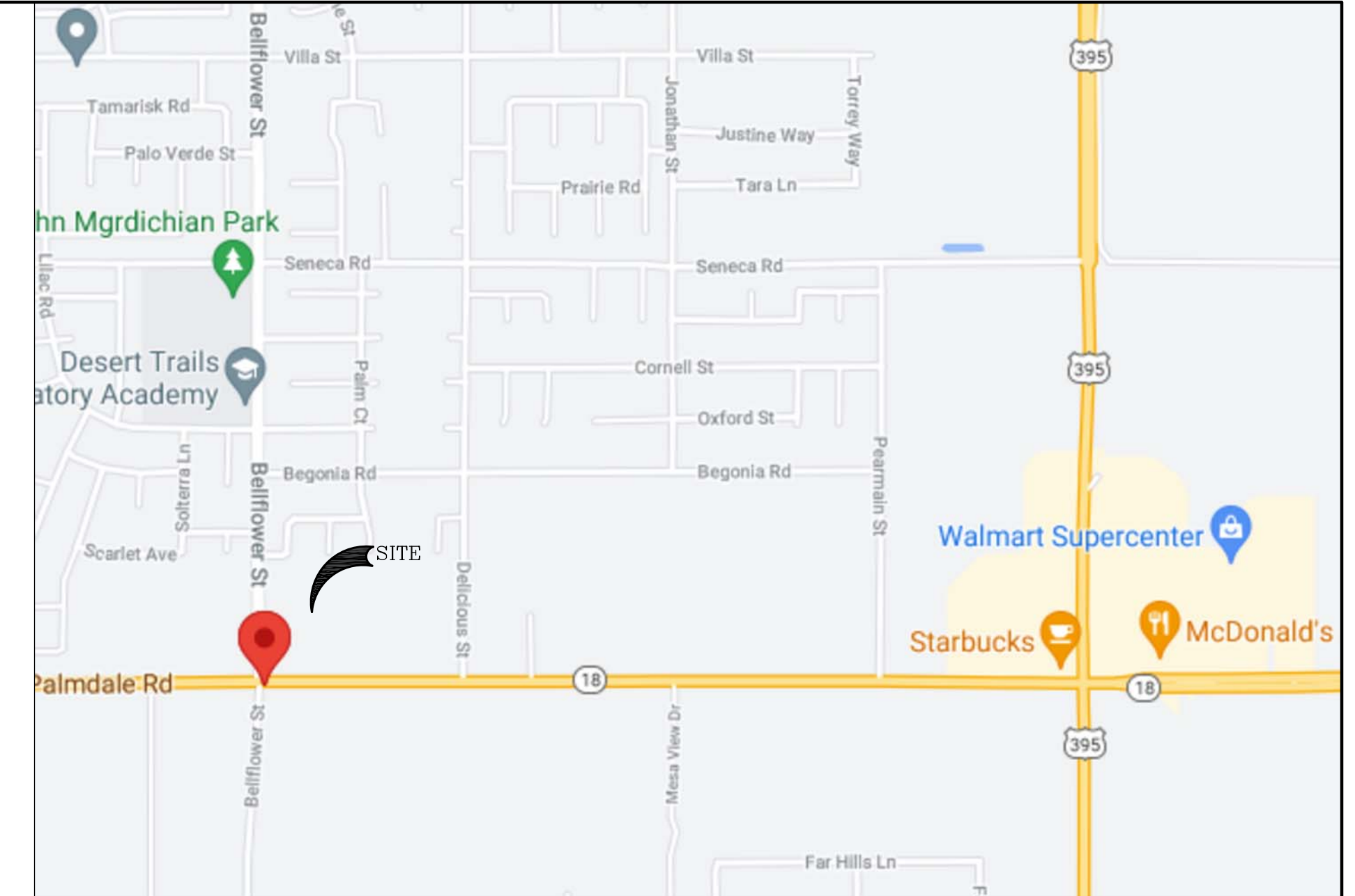
BASIS OF BEARINGS: (NAD83; EPOCH 2010)
 THE BEARINGS SHOWN HEREON ARE BASED CALIFORNIA STATE PLANE COORDINATE SYSTEM - ZONE 5, AS DETERMINED BY G.P.S. OBSERVATIONS, USING TRIMBLE 5700/5800 RECEIVERS AND TRIMBLE GEODETIC OFFICE 1.60 SOFTWARE.

BASIS OF ELEVATIONS: NAVD 1988
 ELEVATIONS ARE BASED ON GPS OBSERVATIONS FROM TWO NATIONAL GEODETIC SURVEY C.O.R.S. REFERENCE STATIONS: 1) JPLM, ELEVATION = 1503.49' AND 2) TORP, ELEVATION = 103.77' WITH GEOD 2012 CORRECTIONS APPLIED.

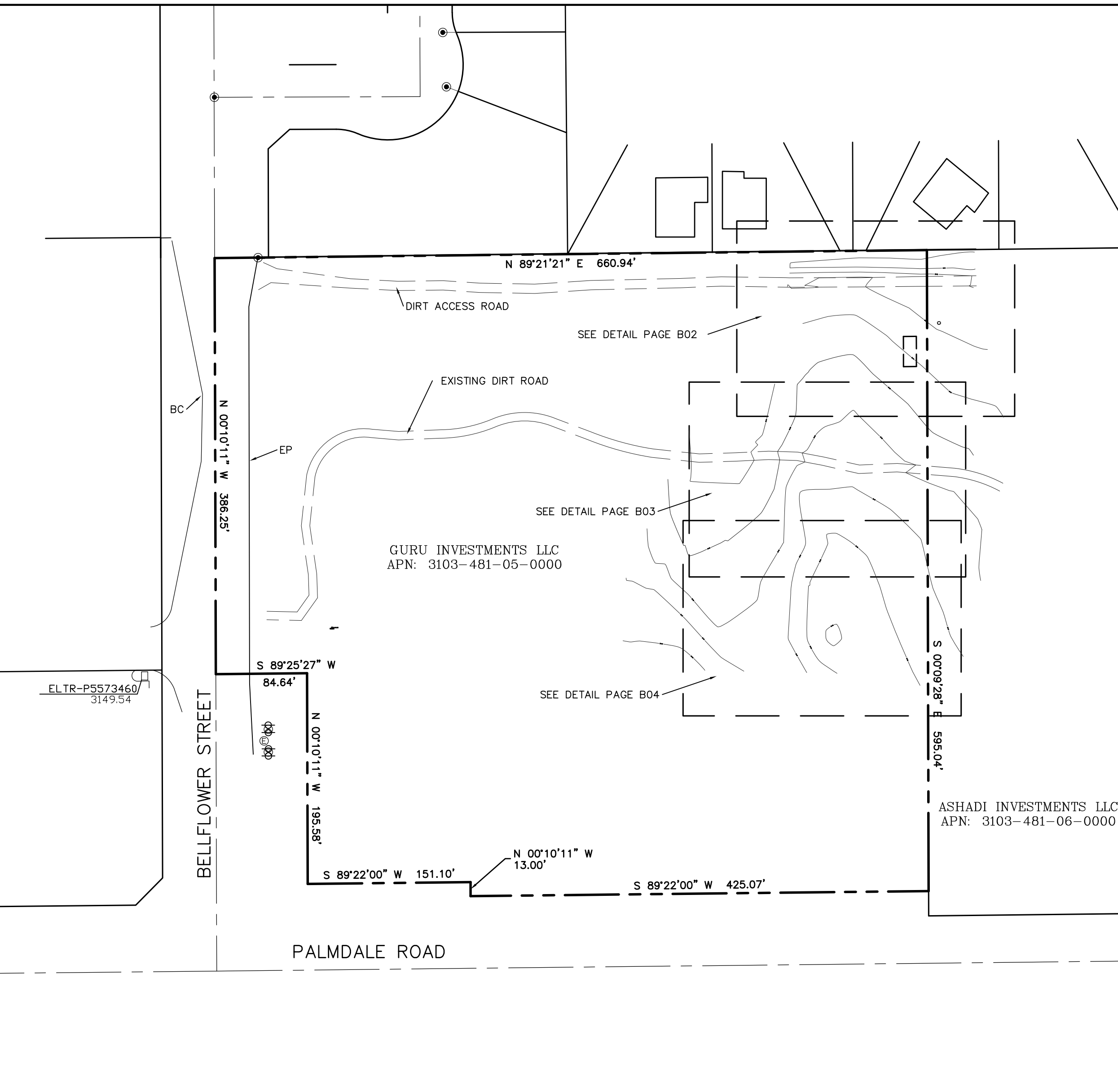
SITE BENCHMARK IS THE TOP OF THE BLOCK WALL, LOCATED AT NE CORNER OF PROPERTY, AS SHOWN HEREON. ELEVATION = 3147.79'

FEMA FLOOD ZONE DESIGNATION: National Flood Insurance Program:

County: SAN BERNARDINO
 Map/Panel: 06071C5795H
 Effective Date: 8/28/2008
 The Flood Zone Designation for this site is: ZONE: D



VICINITY MAP



LEGEND

- ⊕ BOLLARD
- ⊙ ELECTRIC MANHOLE
- ⊙ MONUMENT FOUND
- TREE DECIDUOUS
- ⊙ VENT VAULT
- BC BOTTOM OF CURB
- ELTR ELECTRICAL TRANSFORMER
- EP EDGE OF PAVEMENT
- ER EDGE OF DIRT ROAD
- NG GROUND SPOT ELEVATION
- SW SIDEWALK
- TW TOP OF WALL
- BOUNDARY LINE
- CENTER LINE
- MISC. PROPERTY LINE
- MISC. TIE LINE
- RIGHT-OF-WAY LINE
- EASEMENT LINE
- X- FENCE LINE
- BUILDING EDGE
- OVERHEAD WIRES

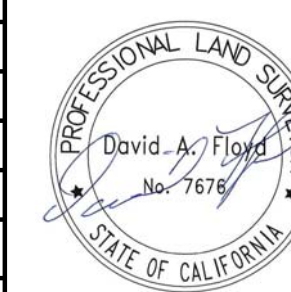
- 1) This is not a boundary survey. This is a specialized topographic map. The property lines and easements shown hereon are from record information as noted hereon. Floyd Surveying translated the topographic survey to record information using the two found monuments shown hereon. No title research was performed by Floyd Surveying.
- 2) Any changes made to the information on this plan, without the written consent of Floyd Surveying relieves Floyd Surveying of any and all liability.
- 3) These drawings & specifications are the property & copyright of Floyd Surveying & shall not be used on any other work except by agreement with the Surveyor. Written dimensions shall take preference over scaled & shall be verified on the job site. Any discrepancy shall be brought to the notice of the Surveyor prior to commencement of any work.
- 4) Field survey completed on August 25, 2021

OVERALL SITE PLAN

SCALE: 1"=80'

SHEET TITLE SHEET NUMBER

TOPOGRAPHIC SURVEY B01



NO.	DATE	REVISIONS	BY	CHK	APP'D
1	10/11/21	ADDITIONAL TOPO	DAF	DAF	DAF
0	8/29/21	ISSUED FOR ZONING SUBMITTAL	DAF	DAF	DAF

SCALE AS SHOWN DESIGNED DRAWN

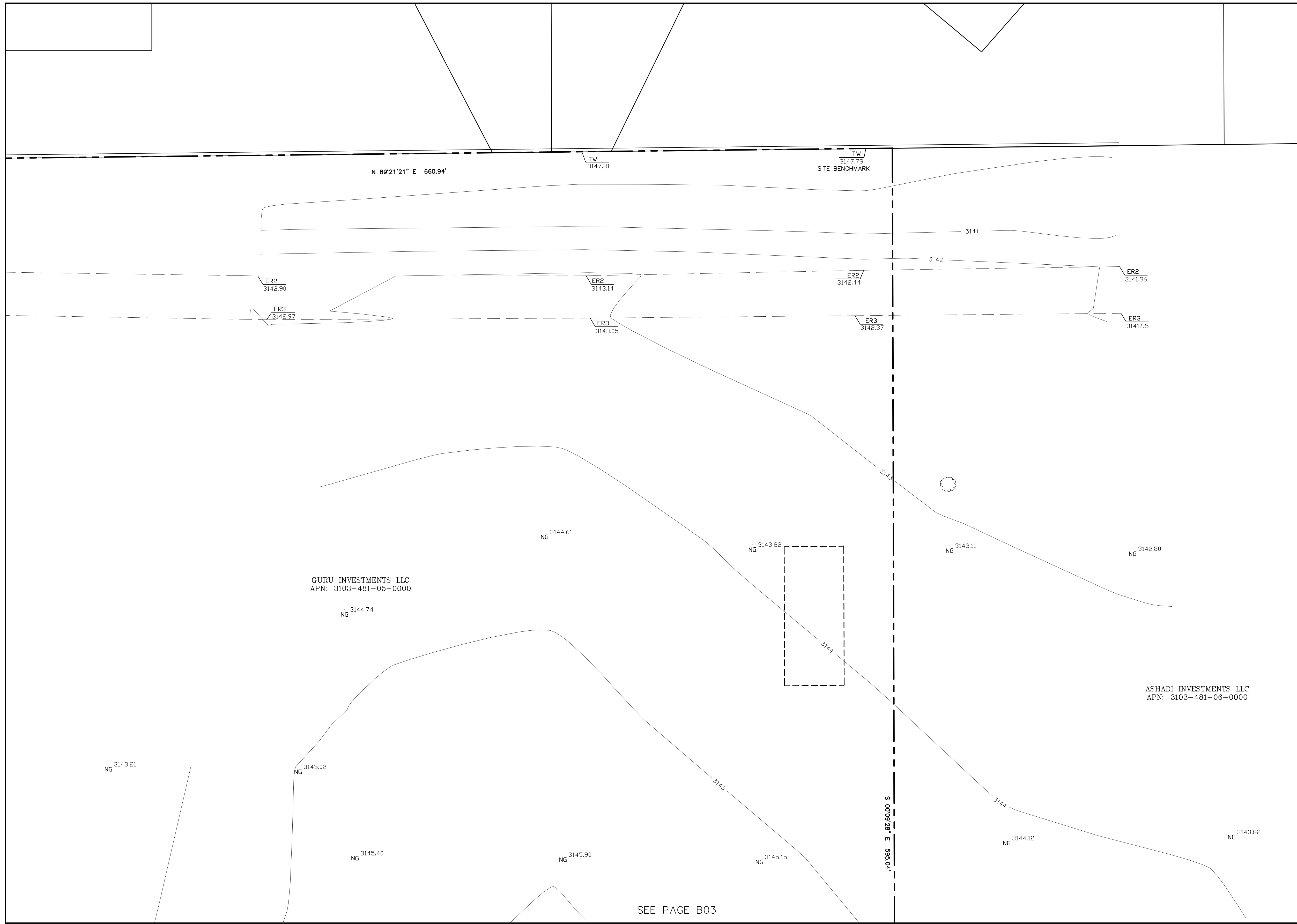
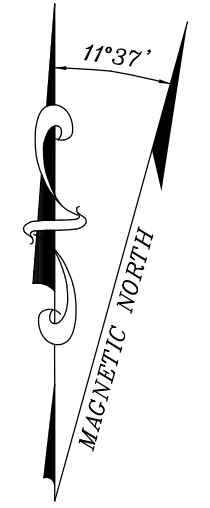
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 TEMECULA, CA 92592
 OFFICE: (949) 200-0626
 EMAIL: fsl@floydsurveying.com

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PALMDALE ROAD
 ADELANTO, CA 92301

at&t
 Mobility
 1452 EDINGER AVENUE, 3RD FLOOR
 TUSTIN, CA 92780



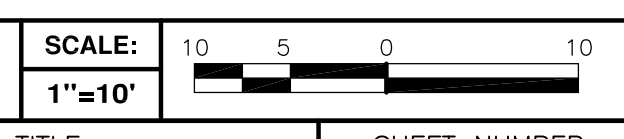
LEGEND

- ⊕ BOLLARD
- ⊙ ELECTRIC MANHOLE
- MONUMENT FOUND
- TREE DECIDUOUS
- ⊗ VENT VAULT
- BC BOTTOM OF CURB
- ELTR ELECTRICAL TRANSFORMER
- EP EDGE OF PAVEMENT
- ER EDGE OF DIRT ROAD
- NG GROUND SPOT ELEVATION
- SW SIDEWALK
- TW TOP OF WALL
- BOUNDARY LINE
- - - CENTER LINE
- MISC. PROPERTY LINE
- - - MISC. TIE LINE
- RIGHT-OF-WAY LINE
- - - EASEMENT LINE
- X - FENCE LINE
- BUILDING EDGE
- OVERHEAD WIRES

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- 4) Field survey completed on August 25, 2021

SEE PAGE B03

DETAIL SITE PLAN



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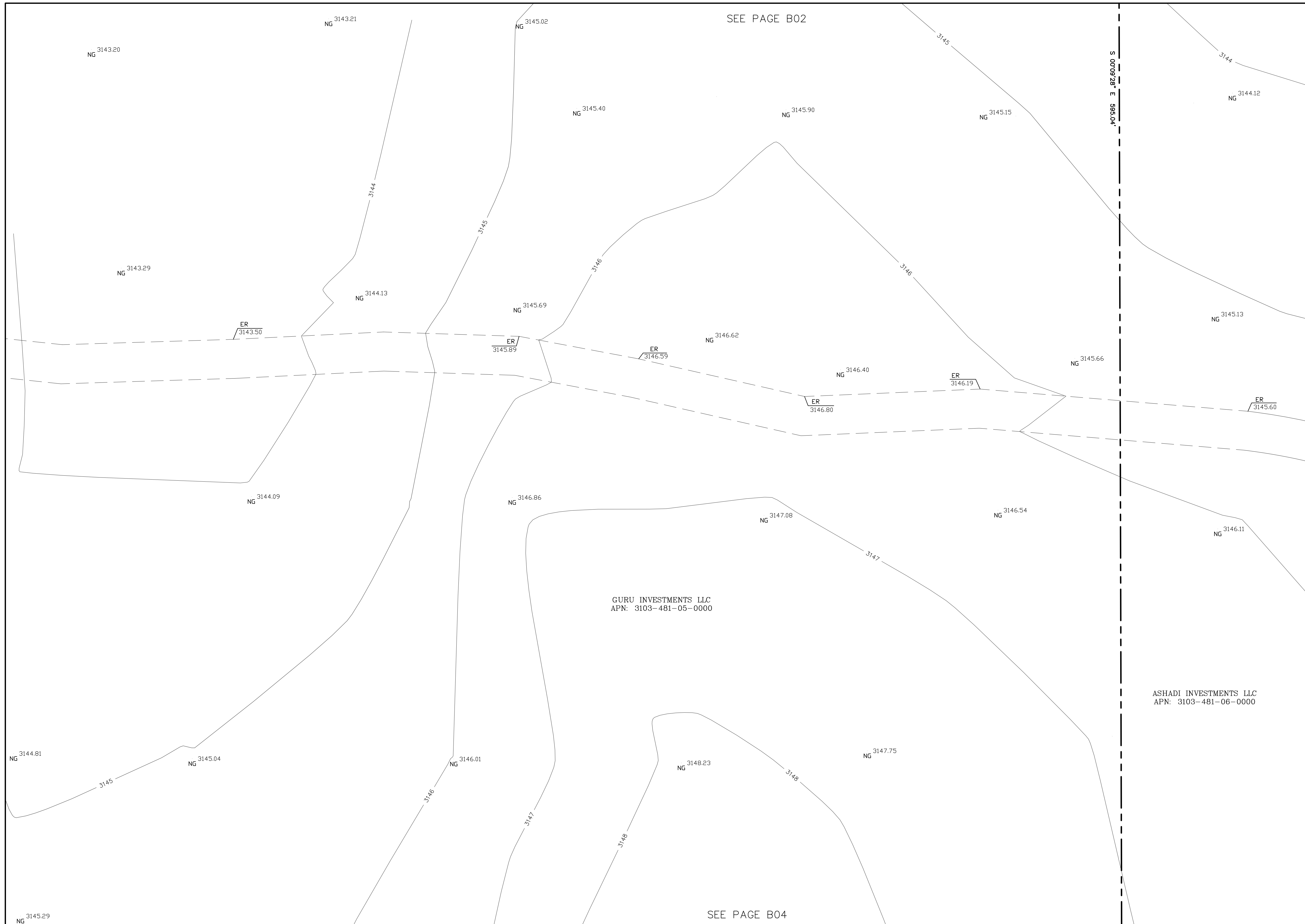
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SHEET TITLE	SHEET NUMBER
TOPOGRAPHIC SURVEY	B02

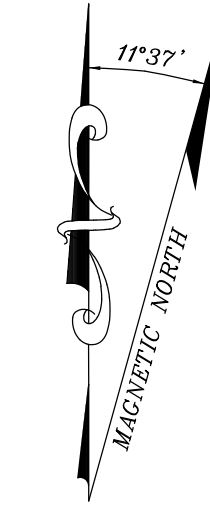


SEE PAGE B02

SEE PAGE B04

GURU INVESTMENTS LLC
APN: 3103-481-05-0000

ASHADI INVESTMENTS LLC
APN: 3103-481-06-0000

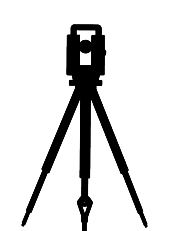
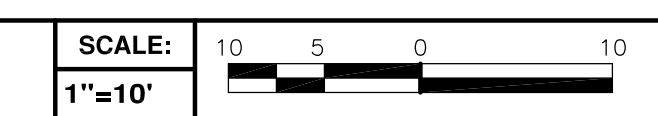


LEGEND

- ⊕ BOLLARD
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EMAIL: fsl@floydsurveying.com

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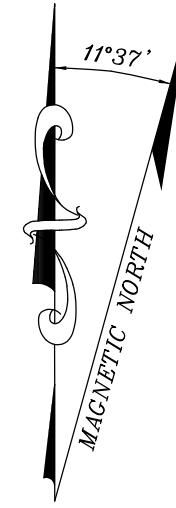
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SHEET TITLE	SHEET NUMBER
TOPOGRAPHIC SURVEY	B03

SEE PAGE B03



LEGEND

- ⊕ BOLLARD
- ⊙ ELECTRIC MANHOLE
- MONUMENT FOUND
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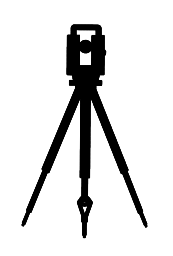
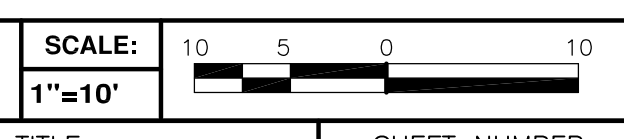
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APN: 3103-481-05-0000

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APN: 3103-481-06-0000

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DETAIL SITE PLAN



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SCALE		AS SHOWN	DESIGNED	DRAWN	



SHEET TITLE	SHEET NUMBER
TOPOGRAPHIC SURVEY	B04

SOURCE DOCUMENTS

SOURCE DOCUMENT 1

**City of Adelanto General Plan and Elements
(Not attached)**

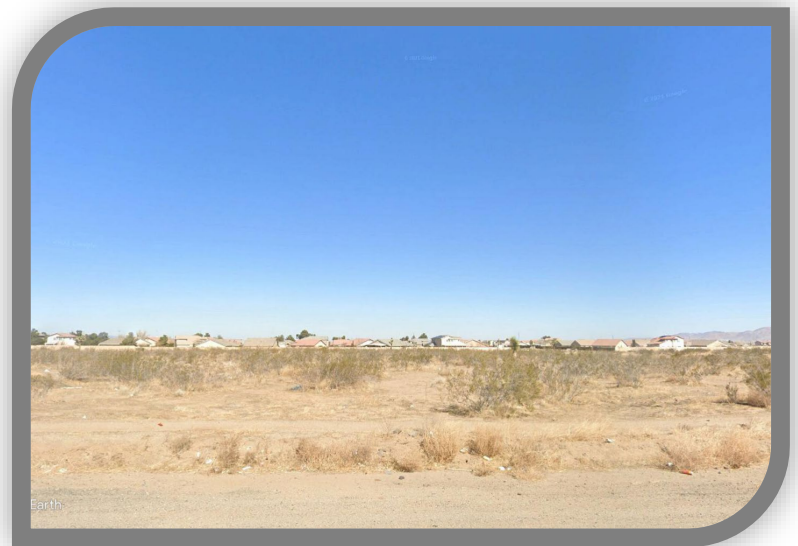
SOURCE DOCUMENT 2

**General Biological Evaluation
December 30, 2021**



9976 Peak Lookout Street, Las Vegas, Nevada, 89178
Phone: 702-614-4431; Fax: 702-614-4171
www.aceenvironmentalllc.com

General Biological Evaluation



AT&T Wireless Site CSL05972

Palmdale Road
Adelanto, San Bernardino County, California 92301

FA 13025526

ACE project no. 21-1899-132-1046

December 30, 2021

Prepared for:
AT&T

5001 Executive Parkway
San Ramon, California 94583

KIDD BIOLOGICAL, INC.

December 28, 2021

Kerry Willoughby
Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178

Subject: General Biological Evaluation for the new “Guru” Telecommunication Facility (Site No. CSL05972) in Adelanto, California

Dear Ms. Willoughby,

As requested, a general biological resources evaluation was conducted by Kidd Biological, Inc. on a proposed cellular communications modification project in Adelanto, California. The purpose of this report is to determine if the modification to an existing communications facility will result in significant impacts to biologically sensitive resources.

Project Description

AT&T proposes to construct a new cellular communications facility in order to improve service in the area. The proposed project will include the construction of a 75-foot-tall mono-eucalyptus tower with associated antennas and equipment mounted on it. A new 34-foot by 20-foot outdoor equipment shelter will be installed where the associated generator and cabinets will be enclosed within a CMU enclosure. A power and telco underground trench will be dug to connect the new site to power and fiber. The route will be approximately 935-feet to the power source along Bellflower Street. A new 12-foot-wide and approximately 590-foot-long access route with maintenance parking will be constructed for site access.

Project Location

The site is located in the City of Adelanto, California, northeast of the intersection of Palmdale Road and Bellflower Street (Figure 1). Delicious Road is to the east. The site is generally located west of Interstate 15 and Highway 395 (Adelanto Road), north of Palmdale Road (County Road 18) and north of the Antelope Highway 138 (Antelope Highway) and Baldy-Mesa Road.

Ecologically, the site is in the high desert area of the Mojave Desert at an elevation of 3,143 feet above mean sea level. The San Bernardino and San Gabriel Mountains are to the south and the Mohave River is to the east. The project location can also be described as being located in Section 21 of Township 5 North, Range 5 West of the Adelanto, California U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map (Figure 2). Surrounding land uses include residential developments to the north and west with open desert immediately to the south.



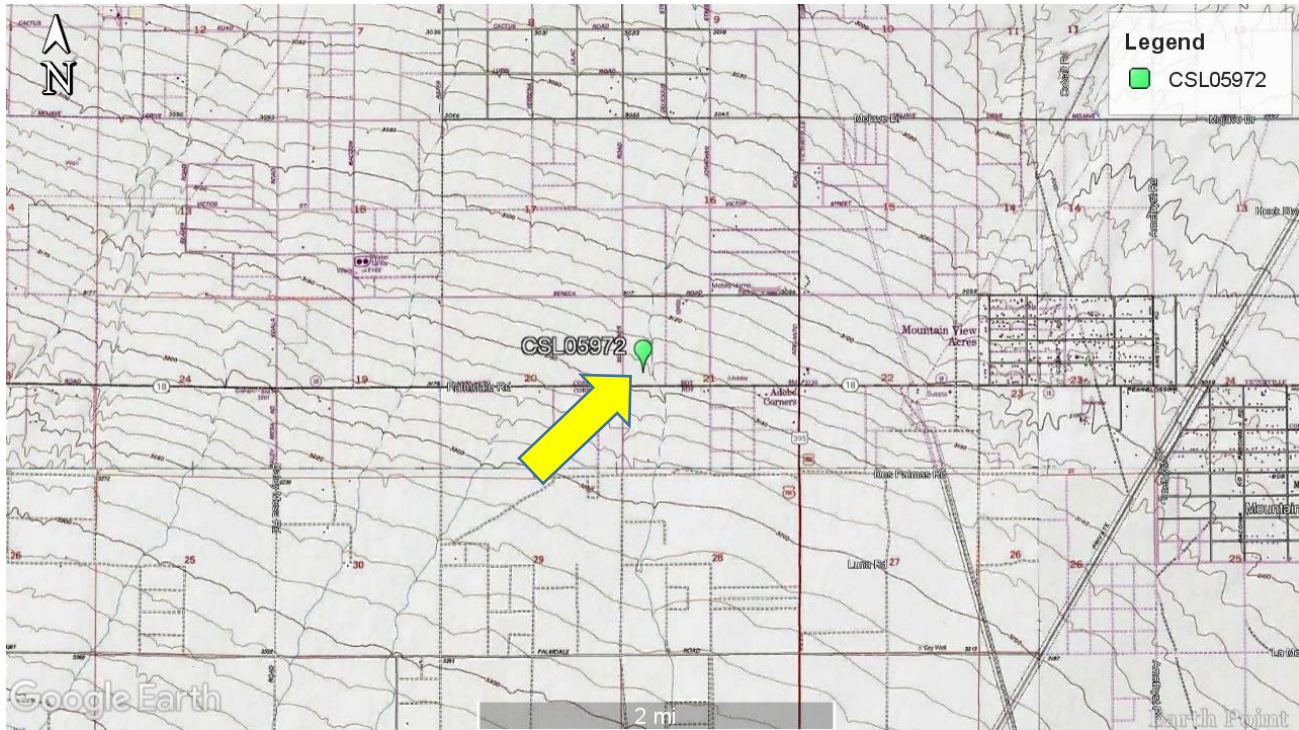
ANACORTES, WA
LAGUNA HILLS, CA

PHONE 949.632.2756
WEBSITE WWW.KIDDBIOINC.COM

FIGURE 1. AERIAL PHOTO OF SITE



FIGURE 2. TOPOGRAPHIC MAP OF SITE LOCATION



Methods

This assessment focused on reviewing documented sensitive biological resources onsite and to use the information found in the literature review to determine the potential for these species to occur onsite. A literature review was done using the California Department of Fish and Wildlife's (CDFW) Natural Diversity Database¹ and California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants². A report was prepared for sensitive species recorded within three miles of the project site. This information was used to determine which sensitive resources had been previously reported on or adjacent to the subject property. Information from other resources such as the U.S. Fish and Wildlife Service (USFWS), telecommunication site plans, and aerial photography were also reviewed.

After reviewing aerial photos, maps and various documents, it was determined which sensitive resources have a potential to occur on site. Criteria used to determine potentials of occupancy include, but are not limited to, soil types and conditions, habitat types and quality, disturbance, site history, adjacent land uses and proximity to nearest known extant populations of each respective species.

Results

Sensitive Resources

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The CDFW, USFWS, and groups like CNPS and Audubon maintain special watch lists of such resources.

The CNDDDB and other sources identified 26 sensitive species as having been previously reported within the vicinity of the project site. A discussion of the potential for these sensitive species to occur onsite is included below in Table 1 as well as in the discussion below.

TABLE 1 – Sensitive Species Occurring in the Area

Species		Status			Potential to Affect
Scientific Name	Common Name	FWS	CDFW	CRPR	
PLANTS					
<i>Asclepias nyctaginifolia</i>	Mojave milkweed	None	None	2B.1	No Effect
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily	None	None	1B.2	No Effect
<i>Canbya candida</i>	white pygmy-poppy	None	None	4.2	No Effect

¹ California Natural Diversity Database (CNDDDB). 2021. [Internet]. CDFW Version 5.96.99. Accessed Dec. 30, 2021

² California Native Plant Society, Rare Plant Program. 2021. Inventory of Rare and Endangered Plants of California (online edition, v9-01 0.10). Website <http://www.rareplants.cnps.org> [accessed 30 December 2021].

Species		Status			Potential to Affect
Scientific Name	Common Name	FWS	CDFW	CRPR	
<i>Chorizanthe xanti</i> var. <i>leucotheca</i>	white-bracted spineflower	None	None	1B.2	No Effect
<i>Loeflingia squarrosa</i> var. <i>artemisiarum</i>	sagebrush loeflingia	None	None	2B.2	No Effect
<i>Opuntia basilaris</i> var. <i>brachyclada</i>	short-joint beavertail	None	None	1B.2	No Effect
WILDLIFE					
<i>Athene cunicularia</i>	burrowing owl	BCC	SC	-	No effect with avoidance measures
<i>Buteo swainsoni</i>	Swainson's hawk	BCC	ST	-	No Effect
<i>Gopherus agassizii</i>	desert tortoise	FT	ST	-	No effect with avoidance measures
<i>Lanius ludovicianus</i>	loggerhead shrike	BCC	SC	-	No effect with avoidance measures
<i>Phrynosoma blainvillii</i>	coast horned lizard	None	SC	-	No effect with avoidance measures
<i>Xerospermophilus mohavensis</i>	Mohave ground squirrel	None	ST	-	Not likely to occur in area ³ .
California Native Plant Society Rare Plant Rank (CRPR) 1B Plants rare, threatened, or endangered in California and elsewhere. 2B Plants rare, threatened, or endangered in California but more common elsewhere 4 Watch List: Plants of limited distribution 0.1-Seriously threatened in California (over 80% of occurrences threatened) 0.2-Moderately threatened in California (20-80% occurrences threatened)					
U.S. Fish and Wildlife Service (FWS) FT- Federally Threatened BCC- Bird of Conservation Concern		California Department of Fish and Wildlife (CDFW) ST- State Threatened SC- State Species of Special Concern			

Existing Conditions

The proposed communication facility is to be located within open desert scrub habitat immediately to the south of a residential development. The surrounding areas are developed with housing tracts with interspersed undeveloped parcels in the area. There are large tracts of open desert habitats immediately to the south. The proposed access road and utility run will require the removal of vegetation for trenching and grading activities. The native desert scrub habitat in the area is dominated by creosote bushes (*Larrea tridentata*) with a few Joshua trees (*Yucca brevifolia*) to the east of the site.

³ Leitner, P. 2015. Current Status of the Mohave Ground Squirrel (*Xerospermophilus mohavensis*): A Five-Year Update (2008–2012). Western Wildlife 2:9-22

Impact Analysis

Of the list of 12 sensitive species having been reported in the area, one federally-listed species has a potential to occur adjacent to the site:

Desert Tortoise: This federally listed species' range extends to the lower foothills of the San Gabriel Mountains. The degraded habitat on site makes it extremely unlikely desert tortoise occur within the project footprint, but tortoise could theoretically use the adjoining parcels and therefore their potential for presence in the area of the project cannot be disregarded. For this reason, appropriate avoidance measures are presented below.

There is also a potential for other state sensitive species to occur in the area:

Burrowing Owl: This small owl is relatively tolerant of human activity and can often be found in fallow fields where burrows are available. It is considered a species of concern in California and a Bird of Conservation Concern by the USFWS. No burrows are expected to be within the lease area; however, the species is known in that area and there is a potential for the species to nest adjacent to the site. Appropriate avoidance measures are recommended below to ensure no direct impacts to this species occur during project implementation and that indirect impacts are reduced to levels below significant.

Loggerhead Shrike: This predatory passerine feeds on lizards, insects and small mammals. They prefer fairly open scrubland habitat with available spiny plant species for food caching. It is considered a species of concern in California and a Bird of Conservation Concern by the USFWS. This species was reported in the area. Appropriate avoidance measures are recommended below to ensure that indirect impacts to this and other nesting birds are reduced to levels below significant.

Coast Horned Lizard: This reptile is found in flat areas with sparse scrub where it forages almost exclusively for ants. The habitat onsite is suitable for this species and although it may occur within the parcel, impacts to this species and the loss of less than a 1/3 of an acre of habitat is not likely to drive this species towards extinction. Regardless, measures are recommended to minimize the impacts to this and other common wildlife species to the greatest extent possible.

Other considerations

There is a relatively large desert wash 175-feet to the east of the project site. This feature will need to be avoided unless a permit is obtained by federal and local agencies. There is also a small erosional feature which may fall under the jurisdiction of State or Federal agencies to the west of the lease area. The access road and utility trench will go through this feature. To ensure the project adheres to the clean water act and other codes, Best Management Practices during work will be required. These are presented below. Additionally, further studies are recommended to ensure the impact to the small drainage feature to the west does not require additional permits for impacts.

The proposed project will not impact or impede any wildlife corridors or remove or degrade any designated critical habitat.

Temporary/Indirect Impacts

Indirect impacts include impacts that are temporarily incurred during construction such as noise, dust, increased human activity and pollutants. Ongoing impacts include intermittent noise from the generator, increases in human activity during maintenance visits and microwave emissions. Plants are generally not significantly impacted by indirect impacts. Wildlife may be negatively impacted in their behavior by noise and increased human activity. Most notably, nesting birds may abandon nests to escape from noise or lighting. Adjacent ornamental landscaping may support nesting birds that are protected by CDFW codes and the Migratory Bird Treaty Act (MBTA), including the burrowing owl and shrike.

Avoidance & Minimization Measures

Bio-1. Nesting Birds:

The surrounding habitat are likely to be used by nesting birds during the breeding season. Due to the potential for birds to nest in the vicinity of this site, including burrowing owls, le Conte's thrasher and loggerhead shrikes, if construction of this site should occur during the bird nesting season⁴ a survey should be conducted no more than 7 days prior to the start of work. If any active nests are found within the work area or the project's zone of influence (generally 100-300 feet), work may need to be postponed, or other avoidance measures may be required to ensure the work does not cause significant impacts to nesting birds.

If an active nest is encountered during the construction by contractors or future maintenance activities, work should stop immediately until a biologist can determine the status of the nest and when work can proceed without risking violation to state or federal laws.

Bio-2. General Construction work site measures:

- All vehicles will maintain speeds <15 mph within unpaved areas of the project site.
- No new roads shall be constructed other than the proposed access route and all vehicles must use the established access routes.
- Crews will contain and remove all trash and debris from the job site before leaving at the end of each work day.
- No standing water will be left on site. Any leaks will be fixed immediately to avoid any ponding.

Bio-3. Sensitive Species measures:

- A qualified biologist will conduct a preconstruction survey for special-status biological resources (desert tortoise and burrowing owls) no more than 7 days prior to the start of work. If any special-status wildlife or their sign (scat, active burrows, tracks, etc.) are observed, the biologist will be

⁴ The nesting season is generally considered February 15- August 30, with peak nesting occurring between March 1 and June 30.

present during construction and/or develop a plan that best avoids impacts to any sensitive species.

- A biologist will provide an Environmental Awareness Training for all personnel prior to the start of any ground disturbing activities.
- If any sign of desert tortoise are found in the area during the preconstruction survey, a qualified biologist will be on site for the duration of the project to ensure no take of the species occurs. Additional avoidance measures will be prescribed by the biologist based on the circumstances of the observations.
- If a desert tortoise is encountered, work will stop until the on-site monitor determines that it is safe to resume work without impacting the tortoise.
- Crew will check for desert tortoise underneath parked vehicles/equipment each time a piece of equipment is moved.

Bio-4. Western Drainage Feature:

It is highly recommended that a regulatory analysis of the small erosional feature to the west of the communication tower be performed by a qualified regulatory specialist to determine if special permitting or avoidances are required.

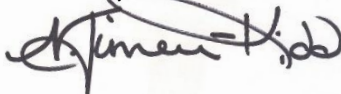
Bio-5. Best Management Practices:

The adjacent drainage will need to be avoided and appropriate BMPs should be followed including, but not limited to:

- All work should be confined to the smallest area possible
- No ground disturbing work should be conducted during, or immediately prior to, a rain event
- Work areas should be clearly delineated with flagging or temporary fencing.
- All stock piled soils should be encircled with straw wattles or silt fencing to prevent run off.
- No refueling of equipment shall occur on site.

Should you have any questions regarding this report, please do not hesitate to contact me at (949) 632-2756.

Sincerely,



Nina Kidd
Wildlife biologist

Attachment 1: Biologist's Qualifications

Nina Jimerson-Kidd

Wildlife Biologist

Permits

- Federal Bird Marking sub-permit: 22951-C
- Flat-tailed Horned Lizard handling MOU (BLM)
- Scientific Collection Permit: 801128-03
- Federal 10A(1)a permit #036550-5
Coastal California Gnatcatcher
Quino Checkerspot Butterfly

Education

BS, Natural Resources Planning & interpretation/ Ecology, Humboldt State University- 1998

Continued Education

Desert Tortoise Council Workshop 2001

Tortoise Egg Handling and Burrow Construction Certificate 2001

South Western Willow Flycatcher Workshop 2001

So. Coast Missing Linkages Project Symposium 2002

Bats of the Southwestern Desert 2002

Burrowing Owl Symposium 2003
California Tiger Salamander

Workshop 2013

California Manual of Vegetation CNPS workshop 2015

Rapid Assessment/Releve Training (CNPS) 2015

Rare Plant Survey Methods Univ Washington 2018

Mrs. Jimerson-Kidd has 20 years' experience in conducting herpetological, entomological, avian and botanical surveys. Her experience includes inventorying both plants and wildlife of southern and central and northwest California. She has experience in raptor trapping, handling, survey techniques, and nest monitoring, as well as some experience with mammal trapping. Mrs. Jimerson-Kidd has conducted numerous focused surveys or habitat assessments for California gnatcatcher, desert tortoise, least bell's vireo, flat-tailed horned lizard, burrowing owls, western spadefoot toad, Delhi-sands flower-loving fly, Arroyo toad, and Quino checkerspot butterfly. Additionally, her experience includes habitat assessments and focused for sensitive plants species, particularly desert species.

Select Professional Experience

Focused Surveys for Endangered Species. Conducted presence/absence surveys as well as pit-fall trapping California gnatcatcher, least Bell's vireo, arroyo toad, Quino-checkerspot butterfly, desert tortoise, burrowing owl, nesting birds, flat-tailed horned lizard, rare plants and general wildlife throughout California and Washington.

General Biological Analyses. For the past 12 years over 1,500 cellular communication sites have been assessed for potential impacts to biological resources. Sites have included all of California, Oregon, Washington, Arizona and Nevada. Species addressed include red-legged frogs, California tiger salamanders, nesting birds, California gnatcatchers, desert tortoise, burrowing owls and others. As part of this work Ms. Kidd has consulted with U.S. Fish and Wildlife Service as a representative of the Federal Communication Commission (FCC) on several projects in Critical Habitat.

Habitat Use Study, California Gnatcatcher. Assisted in conducting a focused survey for the California gnatcatcher. Surveys were conducted in Orange and San Diego Counties to better understand habitat use in post fire areas. Data was collected by U.S. Geological Survey for a long-term study on the species.

Burrowing Owl Relocation. Coordinated with CDFG and USFWS to actively translocate one pair of burrowing owls from a project site in the City of Fontana to a conservation site on U.S. Naval Station, Seal Beach. Assisted in the trapping and release efforts as well as monitoring of the site during grading.

Sensitive Plant Surveys. Ms. Kidd has conducted sensitive plant surveys in both desert and coastal regions of California. Presently Ms. Kidd is participating in the Washington Native Plant Societies Rare Plant Monitoring Program to search for and document historically reported occurrences of rare plants in the region.

Construction monitoring. Has monitored construction activity on numerous projects including communications towers, military training facilities, County road maintenance, linear utility lines, park trails, large housing developments, and restoration activities. Species monitored include arroyo toad, least bell's vireo, California gnatcatcher, burrowing owls and desert tortoise

SOURCE DOCUMENT 3

**Cultural Resources Research and Field Survey
February 6, 2022**



9976 Peak Lookout Street, Las Vegas, Nevada, 89178
Phone: 702-614-4431; Fax: 702-614-4171
www.aceenvironmentalllc.com

Cultural Resource Research and Field Survey



AT&T Wireless Site CSL05972

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Adelanto, San Bernardino County, California 92301

FA 13025526

ACE project no. 21-1899-132-1046

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Prepared for:
AT&T
5001 Executive Parkway
San Ramon, California 94583

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1: South Central Coastal Information Center (SCCIC) Record Search Confirmation	
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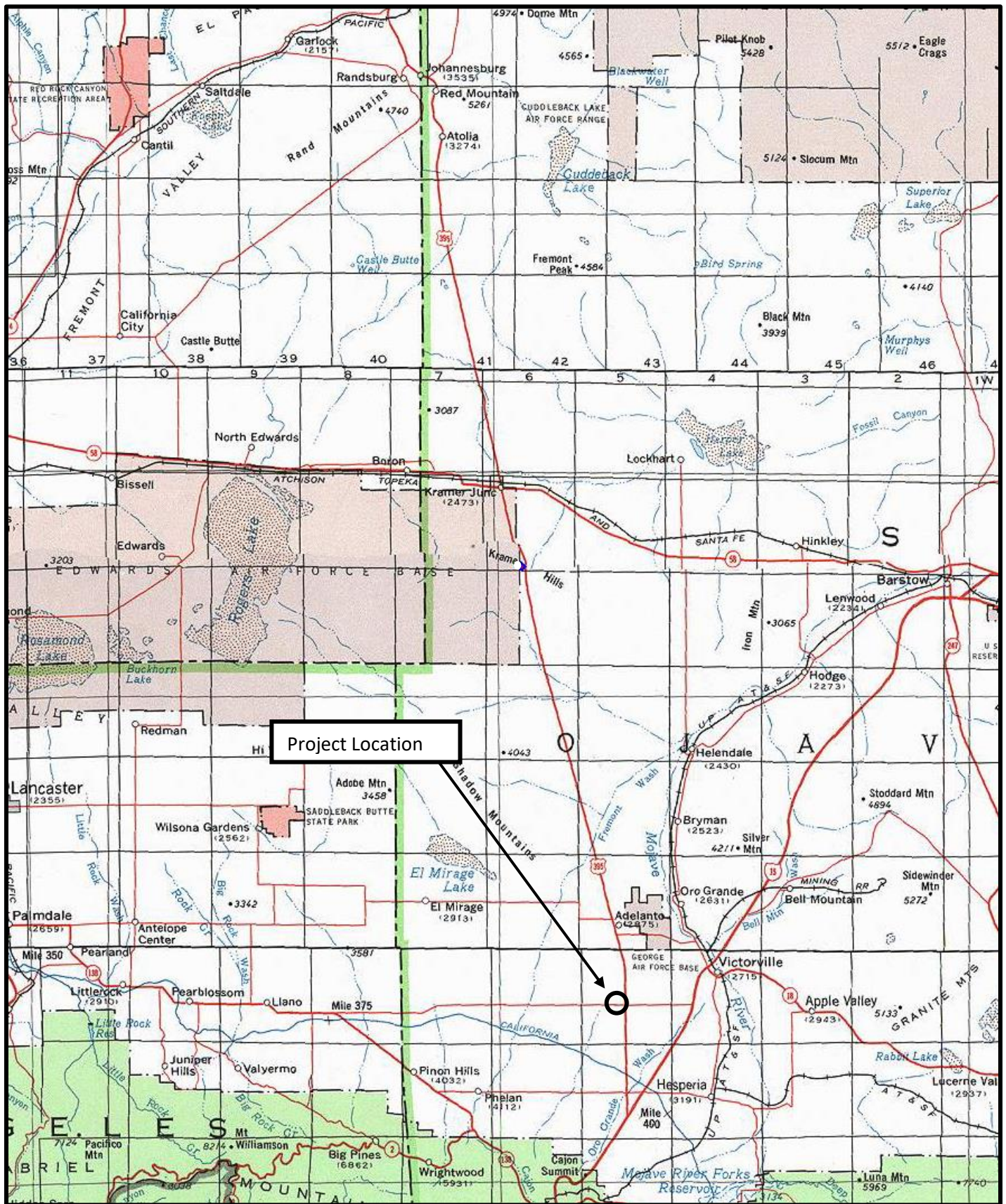
I. INTRODUCTION/UNDERTAKING INFORMATION/SUMMARY

The following report documents the methods and results of archaeological/historical research and field survey for the Belleflower Street/Palmdale Road Adelanto Cell (CSL05972) Project (Figures 1, 2, and 3). The proposed Project is as follows:

<u>SCOPE OF WORK:</u>	AN UNMANNED TELECOMMUNICATIONS FACILITY INCLUDING THE FOLLOWING:
	1. (1) 75'H 3-LIMB MONOEUCALYPTUS
	2. (9) 8'H PANEL ANTENNAS MOUNTED ON (N) MONOEUCALYPTUS
	3. (3) 31"H PANEL ANTENNAS MOUNTED ON (N) MONOEUCALYPTUS
	4. (36) REMOTE RADIO UNITS AND (6) DC9 SURGE SUPPRESSORS AT ANTENNA LEVEL
	5. 10'-8"H CMU ENCLOSURE WITH METAL SECURITY LID
	6. (1) CWIC SHELTER WITHIN (N) CMU ENCLOSURE
	7. (1) 20KW AC GENERAC GENERATOR (W/ 140 GAL. TOTAL) DIESEL FUEL TANK
	8. (1) GPS ANTENNA AT GRADE LEVEL
	9. POWER AND TELCO PANELS
	10. POWER, TELCO AND FIBER/COAX RUNS

The Project Direct-Impact Area of Potential Effect (APE) consists of the footprint of the monopole and enclosure facilities described above, as well as an approximately 600-foot power and telco trench running east from Belleflower Street to the facility and travelling south adjacent to Belleflower Street to power and telco connections, plus an approximately 20-foot buffer area. An area of one-half mile radius was assumed for the Project Indirect-Impact (i.e. visual impact) APE.

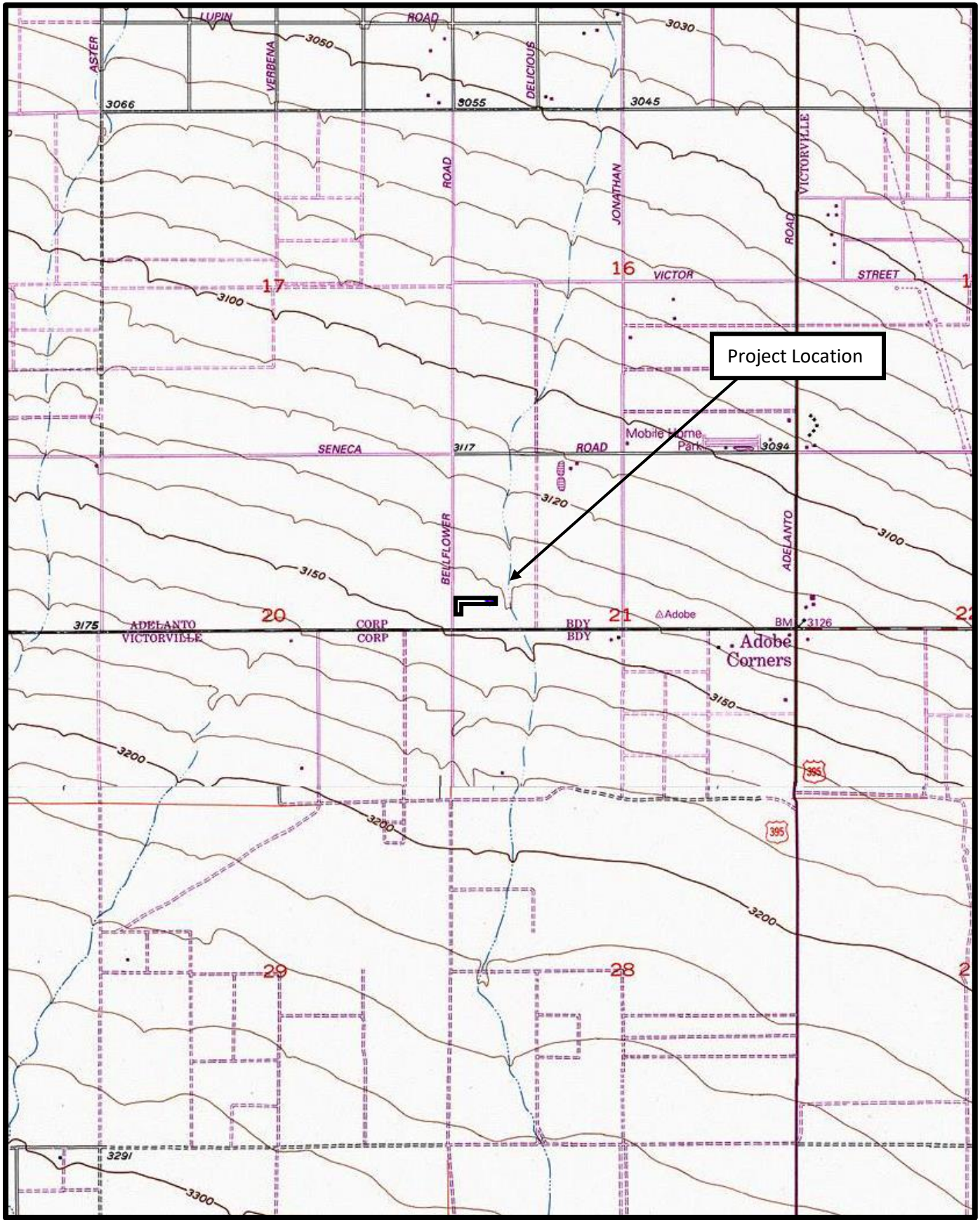
Archaeological field survey was completed for the Project Direct-Impact APE and archival research was conducted for both the Project Direct-Impact APE and the Indirect-Impact APE. (It should be noted that under the "Covid-19 Emergency Protocols for San Bernardino County Record Searches" the record search only included an area of one-quarter mile radius and data that has already been digitized). No archaeological or historical resources were identified in the Project Direct-Impacts APE. No historical resources are listed on the National Register of Historic Places or listed as eligible for the National Register in the California Office of Historic Preservation's 2022 Built Environment Resources Directory (BERD) within the one-half-mile-radius Indirect-Impact APE. Given that the research and survey identified no archaeological or historical resources within the Direct-Impact APE and no archaeological or historical resources listed on the National Register of Historic Places or listed as eligible for the National Register in the California Office of Historic Preservation's 2022 Built Environment Resources Directory (BERD) within the Direct-Impact APE or the Indirect-Impact APE, the report concludes with a recommended finding of "No Historic Properties in the Area of Potential Effects ("APE")" for both the Direct-Impact APE and the Indirect-Impact APE.



**FIGURE 1: PROJECT LOCATION
SOUTHERN CALIFORNIA U.S.G.S. MAP**

0 miles 8.5





**FIGURE 2: PROJECT LOCATION:
ADELANTO and BALDY MESA
U.S.G.S. 7.5-MINUTE MAPS**

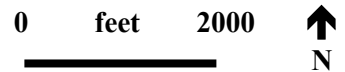




Figure 3: Aerial Photograph of the project APE (Google Earth)

II. SETTING

The following discussion of the project setting and existing conditions provides context for the cultural resource information that follows.

A. Natural Setting

The Project Site is located in the southern Mohave Desert near the head of the Cajon Pass, which travels between the San Gabriel Mountains on the west and the San Bernardino Mountains on the east and links the Mohave Desert with the San Bernardino Valley to the south. Adelanto is one of several communities, including Victorville, Hesperia, and Apple Valley, collectively known as Victor Valley. Lucerne Valley lies to the east and the Mohave River lies to the west. Victor Valley is in a region of Quaternary fan and river alluvium and prior to development was likely a region of desert sage scrub and pinyon-juniper plant communities (Michael Brandman Associates 2010). Although the Project property/Direct-Impact APE is vacant land, it has been severely disturbed by off-road use, erosion, trash-dumping, and transient use. The immediate vicinity has been developed and little native topography or vegetation remains.

B. Cultural Setting

1. Archaeological Background

The Indians of Alta and Baja California had been wanderers and settlers, gatherers and collectors, travelers and traders, adapting to environmental and cultural changes, for at least ten thousand years before Europeans arrived. The Native inhabitants of Baja and Alta California know that their people have inhabited this region since time immemorial. The archaeological evidence affirms that since the Pleistocene, Alta and Baja California Native cultures have adapted to constantly changing environments—gradual large-scale climatic changes as well as rapid local fluctuations. Many of these environmental changes affected cultures throughout the Southwest, inducing regional population migrations, moving peoples, goods, and ideas throughout the region. Thus, Native California cultures have also had to respond to constant cultural migrations and intrusions. By the time of European contact, the Native peoples of the Californias had at least ten thousand years of experience in adapting to environmental and cultural changes. It was this experience that they relied on in adapting to the unprecedented and pervasive environmental and cultural changes that arrived with the Europeans.

There is considerable debate about the specifics of regional prehistory. However, major trends are generally agreed upon (Christenson 1990, Warren, Siegler, and Dittmer 1993, McDonald 1993, Moratto 1984). Much of the early work to develop an understanding of the prehistory of the Mohave Desert was completed by Malcolm Rogers (1929, 1939, 1945), William Wallace (1955, 1962), Campbell and Campbell (1972), Davis et al. (1969), and recently analyzed and summarized in Sutton et al. (2007). The following review of the prehistory of the Holocene in the Mojave Desert region is excerpted from “Technical Background Report in Support of the Cultural Resource Element: City of Hesperia General Plan Update” (Michael Brandman Associates 2010) and “An Archaeological Inventory for the Baldwin Healthy Forest Project” (Denardo 2011).

Paleo-Indian - Clovis Complex – Desert Culture (c. 10000-8000 B.C./12000-10000 B.C.) Clovis is the earliest cultural complex known in the Mojave region. The Clovis Complex is represented only by the fluted projectile points of the same name and a presumed Clovis occupation site at China Lake. It is unknown if all fluted points

from the region represent a Clovis cultural complex or a later complex that used some form of fluted projectile point. It is surmised, based on limited data, that Paleo-Indian peoples lived a highly mobile lifestyle and occupied small temporary camps near permanent water such as now near-extinct desert valley lakes. It is presumed that the period ended with the extinction of large game native to North America and a change in tool kits used to prepare plant foods.

Lake Mojave Complex (c. 8000 - 6000 B.C. / 9000-5000 B.C.) Although it is generally accepted that the earliest occupation on the North American Continent occurred around 10,000 B.C., the earliest “coherent and integrated” (Sutton et al 2007) cultural complex that researchers have identified in the region is the Lake Mojave Complex. This complex is typified by Mojave Lake and Silver Lake projectile points, unifacial tools, crescents, and flaked cobble tools. Various hammerstones and ground stone tools with ephemeral wear are also found within Lake Mojave Complex sites; they are typically discovered on the ground surface. Although few radiocarbon dates are available from Lake Mojave Complex sites, a suite of dates in the Fort Irwin area place sites from this complex to approximately 9000 to 6000 B.C. Milling stones are relatively rare at Lake Mojave Complex sites, and the artifact assemblages indicate long term, multiple uses for several artifact categories. Tool material found at Lake Mojave Complex sites, as well as at the subsequent Pinto Complex, includes locally available stone, rather than imported obsidian or cryptocrystalline silicates. Settlement patterns at Lake Mojave Complex sites generally represent large residential areas and smaller work and camp areas, although larger sites appear to be “functionally redundant” (Sutton et al. 2007:237) indicating long term use of an area by smaller groups. The archaeological evidence suggests that small social units followed a foraging strategy. The large playa lake known as Rosamond Dry Lake lasted for several thousand years and its periphery is the location of numerous flaked stone tool sites.

The Pinto Complex (c. 7000 - 3000 B.C. / 5000 – 2500 B.C.) Pleistocene lakes in the Mojave region began to dry up as a result of a warming trend that began during the Lake Mojave Complex and continued into the Pinto Complex. Although researchers previously thought the Pinto Complex immediately followed the Lake Mojave Complex, recent data indicates these two complexes overlapped at the end of the early Holocene. The Pinto Complex is the most widely distributed pattern of early habitation within the region. Pinto series projectile points show a high degree of reuse and appear to have been used more often as spear tips rather than dart points. The major difference between Pinto and Mojave Lake artifact assemblages is the quantity of ground stone tools, which indicates increased exploitation of vegetal resources from the Lake Mojave to the Pinto Complex. The presence of *Olivella biplicata* beads in Pinto Complex sites infers regional trade relationships. However, the lack of exotic lithic material suggests smaller areas of resource exploitation. Faunal analysis conducted for Pinto Complex sites indicates a decrease in reliance on deer and an increase in exploitation of smaller game. Pinto Complex settlements occur in a wide variety of ecological settings, but they are generally found near available water (e.g., ancient stream beds, lake shores, sear seeps, and springs). Larger residential sites cluster around water sources and are represented by deep middens consistent with semi-permanent habitation sites occupied by relatively large populations.

Environmental instability, an extended period of hot arid weather resulting in the drying of the playa lakes in the eastern Antelope Valley, may have resulted in the population partially or totally abandoning the area. It has also been suggested that the limited population density and vagaries of archaeological preservation may have resulted in the apparent gap in the archaeological record. While an occupational hiatus occurred in many parts of the

Mojave region, it is not evident within the San Bernardino Forest, which may suggest a population shift to higher elevations with cooler temperatures between 3000 and 2000 B.C.

The Gypsum Complex (c. 2000 B.C. – A.D. 500) The Gypsum Complex emerged during the Middle Holocene when climatic conditions were relatively wetter and cooler, and sites from this period are characterized by an increase in cultural complexity and trade. Early Gypsum Complex settlements are generally found near streams, but later sites are more numerous and in more varied locations with larger, sedentary populations. Both Gypsum and Elko type projectile points are found in Gypsum Complex sites, with Gypsum types eventually disappearing around 800 B.C. Elko points generally range between ca. 1500 B.C.-700A.D. In addition to Gypsum and Elko series projectile points, artifact assemblages include fewer utilitarian items, such as paint and quartz crystals. Various examples of rock art in the region date to this period. Exploited faunal species include deer, antelope, hares, and various species of rodents.

Saratoga Springs Complex (c. A.D. 500 – 1200) The Saratoga Springs Complex can be interpreted generally as an extension of the previous Gypsum Period; however, regional variations in artifact types become more pronounced. An increase in small seed and small mammal exploitation replaces large mammal hunting as the major subsistence pattern (Mason et al. 1995) and a general shift away from foraging to collecting is indicated (McGuire and Hall 1988 in Mason et al. 1995). An increase in upland Piñon processing camps also probably dates to this period (Moratto 2004). Elko projectile point types are replaced by Cottonwood Triangular point types. The projectile point type shift reflects the introduction of the bow and arrow, which replaces the dart and atlatl. Rose Springs point types, common elsewhere in the northern part of the region, are scarce. Ceramics found in the Project vicinity probably date to this period, although the evidence for this is scant (Lerch and Ciolek-Torrello 2007). The increasing frequency of marine shell beads in later period sites suggest trade with peoples on the southern California coast rather than inland groups.

The Late Prehistoric Complex (c. A.D. 1200 – Contact) New technologies and a decrease in population are indicative of the Late Prehistoric Complex. Late Prehistoric site types in the region are varied, and range from seasonal camps to a few large residential sites with associated cemeteries. Artifacts from these sites include Desert Side-notched and Cottonwood projectile points, slate pendants, shell beads, buff and brown ware ceramics, steatite beads, and a variety of milling tools and ground stone implements. As the prevalence of obsidian declined, cryptocrystalline silicates became the major raw material used to manufacture tools to exploit various plant resources, and to hunt hare and deer. Although the Late Prehistoric complex is relatively well understood, the exact sequence and explanations for cultural change in the region have shifted from models involving population migration and expansion toward frameworks based on environmental influences. The archaeological record in the Mojave region suggests periods of aboriginal population increases and declines as successive cultures prospered in times of more environmental stability and struggled or collapsed during periodic drought episodes (Moratto 2004). Exploiting an increased variety of resources, coupled with trade with other groups to buffer local shortages, allowed prehistoric peoples to adapt and cope with environmental pressures in an otherwise harsh environment.

The Ethnohistoric Cultural Complex (Post-Contact) A host of technological and cultural changes, including the manufacture of ceramics, decreased population, changing environmental and social conditions, nomadism and the extensive use and trade of Euro-American material goods are indicative of the Ethnographic Cultural Complex

(Post- Contact) (Moratto 2004). There are various hallmarks of this time period, the first two of which are historical developments that are difficult to identify in the archaeological record. They consist of the introduction of the horse and Old-World diseases (Arkush 1990). Modifications to Native American material culture resulted from an infusion of a variety of mass-produced items obtained through interaction with neighboring native groups, as well as with Euro-American trappers, traders, pioneers, and immigrants (Arkush 1990). Artifacts from these sites include glass trade-beads, round and oval thin lipped shell beads (although successive in time), small Cottonwood projectile points, anomalous flake points, Buff and Brown ware ceramics, a variety of milling tools and ground stone implements, and iron utensils such as knives, axes, awls and fishhooks (Arkush 1990; Bennyhoff and Hughes 1987).

The above review of the southern California archaeological literature illustrates that adaptation to environmental change has characterized ten thousand years of prehistory, encouraging the development of a highly mobile, adaptive, and exchange-oriented society. Additional insight into how the Serrano settlement strategy fit within the settlement and subsistence pattern that evolved throughout the Holocene can be revealed by inspection of the ethnographic record.

2. Ethnographic Background

The ethnographic record for Alta and Baja California illuminates the cultural contexts for the archaeological record: a pattern of seasonal migrations, travel, and exchange. Gatherings for communal food-collecting and ceremonial events strengthened inter-lineage social and cultural ties and provided settings for exchange of goods and ideas. Ceremonies and gatherings documented by the early ethnographers were occasions of gift giving, feasting, and gaming (Dubois 1908, Kroeber 1908 and 1925, Sparkman 1908, Davis 1919, Strong 1929).

The following ethnographic information is excerpted from the Lowell Bean and Charles Smith 1978 article on the Serrano in the Smithsonian Handbook of North American Indians, Volume 8: California, from the Technical Background Report in Support of the Cultural Resource Element: City of Hesperia General Plan Update (Michael Brandman Associates 2010), from "History of Apple Valley" (Town of Apple Valley 2020), and from the Baldwin Healthy Forest Archaeological Inventory Report (Denardo 2011).

The project site in the Victor Valley was occupied by the localized lineages of the Serrano (east of Cajon Pass, south of Victorville, west of Twentynine Palms, and south to Yucaipa Valley) and possibly by the Vanume (along the Mojave River in the Victorville region). The name Serrano is derived from a Spanish word meaning "mountaineer" or "highlander" (Bean and Smith 1978). Linguistically, the Serrano are classified as Takic-speakers, a branch of the larger Uto-Aztecan language family that is believed to have spread westward from the Mojave Desert ca. 1500-1000 B.C. The Serrano and other Takic-speaking culture groups, such as the Gabrielino, Cahuilla, and Luiseño, are thought to have settled into their separate territories ca. 1500-1200 B.C. (Moratto 2004). While each of these groups spoke their own dialects and maintained distinct ethnicity, they shared similar settlement and subsistence patterns. It is highly likely that the Serrano socialized with the Cahuilla Indians, who lived to the south of the San Bernardino Mountains. Both tribes spoke languages within the Takic sub-family of the Uto-Aztecan family, and had similar myths, social organization, and settlement and subsistence patterns (Bean and Smith 1978). The Cahuilla were also invited to collect piñon seeds from Serrano gathering areas (Benedict 1924; Harrington 1986).

The Serrano divided themselves into two patrilineal, exogamous moieties: the *Tukum*, or Wildcats, and the *Wahiyam*, or Coyotes (Bean and Smith 1978:572; Strong 1929). The clan acted as a localized political unit that controlled specific resource areas, and only formed ceremonial bonds with other clans. The typical Serrano village was near a river or stream and contained anywhere from 25 to 100 people (Smith and Smith 1939; Bean and Smith 1978). The Serrano were regarded as exceptional basket weavers. Highly decorative and tightly woven baskets were made from rush (*huaac*), deer grass (*utsuts*), or sumac (*huuts*) fibers (Lerch 2005; Johnston 1980). Ceramic vessels such as bowls, pots, ollas, and trays were manufactured from red clay gathered in the mountains (Benedict 1924). Shells, wood, animal skins, bone, and stone were also used to make clothing, blankets, arrows, awls, and musical instruments (Bean and Smith 1978). Important foods in the Serrano diet were piñon nuts and acorns. Trips were made during fall months to the Bear Valley region to gather piñon nuts, which were usually eaten whole or crushed into a mush (Benedict 1924:392). In late autumn, Serrano women and children would travel to the vast California black oak (*Quercus kelloggi*) stands along the Santa Ana River to gather acorns, which were also crushed into a mush (Benedict 1924:391; Northwest 2004:72). Mesquite beans in the desert regions were also a staple food, and the Serrano plant diet was supplemented seasonally with chia and rice grass seeds, roots, tubers, and various fresh greens (Bean and Smith 1978; Lerch 2005). Milling slabs, manos, and mortars were used to crush nuts and vegetative material, and the surplus was usually stored in large baskets mounted on poles outside (Bean and Smith 1978).

Currently, most Serrano live on the Morongo or San Manuel reservations. The Morongo Reservation was set aside by President Grant by executive order in 1865 and was originally 640 acres. It is currently over 33,000 acres and is home to several tribes, mainly the Serrano, Cahuilla, and Cupeño (Morongo Band of Mission Indians website 2009). The United States Congress established the San Manuel Reservation in 1891 with 657 acres, but has since grown to over 800 acres. All the residents who live on the San Manuel Reservation belong to the Serrano tribe (San Manuel Band of Mission Indians website 2009).

3. Historic Background

The arrival of the Spanish colonists in San Diego Bay and subsequent expeditions up the California coast marked the beginning of European presence in San Diego and the end of the traditional hunter-gatherer existence of the local Native Americans. Settlement during the Spanish period focused on the Presidio defensive post at the opening of the San Diego River into San Diego Bay and on the Missions to the north: San Diego de Alcalá several miles inland on the north terrace of the San Diego River valley, San Luis Rey inland on the San Luis Rey River, San Juan Capistrano, and San Gabriel. Early explorers and missionaries who travelled through the Mohave Desert region included Pedro Fages in 1772, Juan Bautista de Anza in 1775, and Father Francisco Garcés in 1776. These early explorers undoubtedly utilized the prehistoric native trails as did the later traders in the early 1800s. Known by then as the Old Spanish Trail, the Mormon Trail / Santa Fe and Salt Lake Trail / the Canal Lane Historic Road are all part of the same general route. By mid-century, approximately 300-500 people used the Mormon Trail each year, traveling through the Victor Valley region.

In 1847, the Atchison, Topeka, and Santa Fe Railroad ran tracks through the Victor Valley, establishing a stop called Victor (Victorville). In nearby Hesperia, the first wooden structure was built in 1857 and the town was officially named when the rail depot was established in 1885. Apple Valley, to the east, remained pastoral, developed in ranches and orchards (Wikipedia 2020). In the latter half of the 19th century, Victorville boomed as

the commercial center of the area. After the turn of the 20th century, agriculture developed in the Victor Valley communities. The Hesperia Land and Water Company was formed and grape production and fire-wood shipping became notable industries of the Hesperia area. By 1920, Apple Valley was producing large quantities of apples and the area was known for its award-winning orchards.

Unlike these agricultural communities, Adelanto was founded in 1915 to become a master-planned community in Southern California. E.H. Richardson bought the land that would become Adelanto, hoping to sell to veterans with respiratory ailments suffered during World War I. Adelanto also became famous for fresh fruit and cider production until the depression when they were replaced by poultry ranches. Victor Valley commerce related to Route 66 travelers prospered in the early 20th century. In 1941, the Victorville Army Air Field was established, named George Air Force Base in 1950. After World War II, the Victor Valley communities attracted health-seekers and tourists drawn by the rural western lifestyle. Hesperia incorporated in 1988. The Town of Apple Valley incorporated in 1988. Adelanto incorporated in 1970. (Michael Brandman Associates 2010, Town of Apple Valley 2020, City of Adelanto 2021).

III. METHODS

The study included 1) a records search conducted by the South Central Coastal Information Center; 2) a review of archival information and reports concerning the project area; 3) a field reconnaissance of the Project Direct-Impacts APE/Project site; 4) a 0.5-mile-radius windshield review of the Indirect-Impact APE/surrounding area; 5) a 0.5-mile-radius search for sites listed on the National Register of Historic Places and for Properties listed as eligible in the California Office of Historic Preservation's 2022 Built Environment Resources Directory (BERD), and 6) preparation of this report. This report utilizes the general format recommended by the California Office of Historic Preservation: "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (OHP 1989). Research materials and field notes, associated with this investigation are currently on file at Heritage Resources, P.O. Box 8, Ramona, California, 92065.

A. Research Methods

Record searches were completed by the South Central Coastal Information Center for the Indirect-Impacts APE. Under the "Covid-19 Emergency Protocols for San Bernardino County Record Searches" the record search only included an area of one-quarter mile and data that the Center already has digitized. An on-line search of the National Parks Service website and the Wikipedia National Register website was conducted to identify any properties listed on the National Register of Historic Places within 0.5-mile. The California Office of Historic Preservation's 2022 Built Environment Resources Directory (BERD) was searched for Properties identified as appearing eligible for the National Register (Status codes 1D, 1S, 2B, 2D, 2D2, 2D3, 2D4, S, S2, S3, S4, 3B, 3D, 3S, and 4CM) within 0.5-mile. Other research materials included primary and secondary sources in the author's research library and available on-line.

B. Field Methods

The Direct-Impact APE (the Project site footprint plus a 20-foot buffer) was inspected on foot by archaeologist/historian Sue Wade on December 8, 2021. The proposed Project/Direct-Impact APE is located in a vacant lot at the northeast corner of the intersection of Belleflower Street and Palmdale Road. The monopole and

enclosure location were inspected. The east-west access road and power/telco conduit trench location were walked in four east-west transects. The north-south power/telco conduit trench location along the east side of Belleflower Street was walked in two north-south transects. Representative photographs were taken (Attachment 2).

The 0.5-mile-radius Indirect-Impact APE, was inspected via a limited windshield survey as no Historic Properties are recorded within 0.5 mile.

IV. RESULTS

A. Research

The details of the archival research are presented in Section II.B. above. In summary, the project site is located within territory traditionally claimed by the Serrano, whose occupations were reportedly focused near water sources. Prehistoric use of the Project vicinity appears to have been low based on the lack of prehistoric sites recorded within 0.25 mile. Historically, the area of Adelanto consisted of orchard and poultry agriculture and after World War II, developed in rural residential.

No properties are listed on the National Register of Historic Places or listed as appearing eligible for the National Register in the California Office of Historic Preservation’s 2022 Built Environment Resources Directory (BERD) within 0.5 mile of the Project facility.

One archaeological/historical study, with negative results and not including the proposed Project / Direct-Impact APE, is documented at the SCCIC as having been completed within one-quarter mile of the Project. Two cultural resources have been otherwise recorded within 0.25 mile of the proposed Project / Direct-Impact APE, the historic Palmdale to Victorville Road (p-36-01289) and a minor domestic trash scatter (P-36-026824). Both have been determined or recommended not eligible for the National Register of Historic Places.

The archaeological/historical research projects and resources are listed below with pertinent data in Tables 1 and 2.

Table 1: Cultural Resource Management Reports Within One-Half Mile of the Project Site

Report#	Author	Date	Title	Resources Recorded 0.5 mile
SB-07915	Delu, Antonina	2015	Archaeological Survey Report for the State Route 18 Widen Shoulders and Install Centerline and Shoulder Rumble Strips Between State Route 395 and L.A. County Line within and Near the Cities of Adelanto and Victorville, San Bernardino County, California	none

* Report includes current Project area/APE

Table 2: Archaeological/Historical Resources Within One-Half-Mile of the Project Site

CHRIS # P-36-	Description	Distance from Project Site	Recorded by	Recommended NRHP Eligibility Assessment
P-36-012189	AH07; AH16; HP37: California State Route 18, Palmdale to Victorville Road	0.1 mile S	2005 (BRUNZELL, LSA); 2012 (M. O'Neill, Pacific Legacy); 2013 (Andrea Bean and Aaron Elzinga, SWCA); 2015 (Carrie Chasteen, Applied Earthworks); 2015 (Patrick B. Stanton, SRI); 2017 (S. Andrews, ASM)	Recommended 6Z (Chasteen 2015) Determined ineligible for NR through Section 106 process 6Y (BERD)
P-36-026824	HP33, AH4: minor domestic trash dump, circa 1880-1914	0.2 mile S	2015 (K. Moslak, Applied Earthworks)	Recommended 6Z ((Bouscaren 2015)

AP02 = lithic scatter; AP04 = bedrock milling feature; AP15 = habitation debris; AH16 = other

AH01 = unknown; AH02 = foundations; AH03 = landscaping; AH04 = privy pit, trash scatter,dump;
AH06 = water conveyance system; AH07 = road, trail, railroad bed; AH09 = mine; AH11 = wall, fence; AH15 = standing structure; AH16 = other

HP02 = single family property; HP06 = commercial building; HP11 = engineering structure; HP15 = educational building;
HP22 = lake, river, reservoir; HP30 = trees, vegetation; HP33 = farm, ranch; HP37 = highway, trail; HP46 = wall, gate, fence

B. Field Survey

As a result of the December 8, 2021 survey of the Direct-Impact APE/Project facility footprint, no archaeological or historical resources were discovered. The proposed Project location / Direct-Impact APE in a vacant lot has been highly disturbed by off-road use, erosion, trash-dumping, and transient use but still retains a hummocky topography resulting from wind-blown sands held in mounds by desert scrub vegetation. Surface soils consisted of sandy-gravelly silt with quartz and other water and weather-worn small rocks. Surface visibility was good.

The surrounding land uses are modern subdivision residential to the north, one commercial complex to the west, and vacant land and widely-spaced rural residential to the south and east. The windshield review encountered no additional potential historic resources.

V. MANAGEMENT CONSIDERATIONS

A. Regulatory Considerations

a. Section 106 of the National Historic Preservation Act / National Register of Historic Places

Section 106 of the National Historic Preservation Act, / 36 CFR 800.4(c)(1). establishes a consultation process which is intended to provide for historic preservation concerns within the needs of Federal endeavors. The process requires that prior to approval of an endeavor, the Advisory Council on Historic Preservation be provided a reasonable opportunity to comment on the project. Consulting parties are the primary participants in this process and may include Federal Agencies, the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation and other interested persons (local governments, applicants, Native American individuals and groups, and the general public). The Section 106 process applies to projects involving Federal land, funds or

permits. It requires a Federal Agency with jurisdiction over a Federal, federally assisted, or federally licensed endeavor to take into account the effects of the agency's endeavor on properties included in or eligible for the National Register.

The National Register of Historic Places Criteria for Eligibility identify "the range of resources and kinds of significance that will qualify properties for listing in the National Register. ... Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. ... The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and: 1) that are associated with events that have made a significant contribution to the broad patterns of our history; or 2) that are associated with the lives of persons significant in our past; or 3) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or 4) that have yielded, or may be likely to yield, information important in prehistory or history" (U.S. Department of Interior, National Park Service 1982).

b. Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission

In 2004, to facilitate Federal Communications Commission compliance with Section 106 of the National Historic Preservation Act, the Advisory Council on Historic Preservation, the Federal Communications Commission, and the National Conference of State Historic Preservation Officers executed a Nationwide Programmatic Agreement. This Nationwide Agreement outlines the Applicability and Scope of the Agreement; Definitions; Undertakings Excluded from Section 106 Review; Participation of Indian Tribes and Native Hawaiian Organizations in Undertakings off Tribal Lands; Public Participation and Consulting Parties; Identification, Evaluation, and Assessment of Effects; Procedures; Emergency Situations; Inadvertent or Post-Review Discoveries; Construction Prior to Compliance with Section 106; Public Comments and Objections; Amendments; Termination; Annual Review; Reservation of Rights; and Severability. The methods employed for the current Project review comply with the section regarding Identification, Evaluation, and Assessment of Effects.

B. Findings

Archaeological field survey was completed for the Project Direct-Impact APE and archival research was conducted for both the Project Direct-Impact APE and the Indirect-Impact APE. (It should be noted that under the "Covid-19 Emergency Protocols for San Bernardino County Record Searches" the record search only included an area of one-quarter mile radius and data that has already been digitized). No archaeological or historical resources were identified in the Project Direct-Impacts APE. No historical resources are listed on the National Register of Historic Places or listed as eligible for the National Register in the California Office of Historic Preservation's 2022 Built Environment Resources Directory (BERD) within the one-half-mile-radius Indirect-Impact APE. Given that the research and survey identified no archaeological or historical resources within the Direct-Impact APE and no archaeological or historical resources listed on the National Register of Historic Places or listed as eligible for the National Register in the California Office of Historic Preservation's 2022 Built

Environment Resources Directory (BERD) within the Direct-Impact APE or the Indirect-Impact APE, the report concludes with a recommended finding of “No Historic Properties in the Area of Potential Effects (“APE”)” for both the Direct-Impact APE and the Indirect-Impact APE.

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Attachments

- 1) **South Central Coastal Information Center Record Search Confirmation**
- 2) **Photographs**

Attachment 1: SCCIC Record Search Confirmation

South Central Coastal Information Center

California State University, Fullerton
Department of Anthropology MH-426
800 North State College Boulevard
Fullerton, CA 92834-6846
657.278.5395 / FAX 657.278.5542
sccic@fullerton.edu

California Historical Resources Information System
Orange, Los Angeles, and Ventura Counties

2/4/2022

Records Search File No.: 23304.9356

Sue A. Wade
Heritage Resources
P.O. Box 8
Ramona, CA 92065

Re: Record Search Results for the Palmdale Road Adelanto Cell (CSL05972)

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Adelanto, CA USGS 7.5' quadrangle(s). Due to the COVID-19 emergency, we have implemented new records search protocols, which limits the deliverables available to you at this time. WE ARE ONLY PROVIDING DATA THAT IS ALREADY DIGITAL AT THIS TIME. Please see the attached document on COVID-19 Emergency Protocols for what data is available and for future instructions on how to submit a records search request during the course of this crisis. If your selections on your data request form are in conflict with this document, we reserve the right to default to emergency protocols and provide you with what we stated on this document. You may receive more than you asked for or less than you wanted. The following reflects the results of the records search for the project area and a ¼-mile radius:

As indicated on the data request form, the locations of resources and reports are provided in the following format: custom GIS maps shape files hand-drawn maps

Resources within project area: 0	None
Resources within ¼-mile radius: 2	SEE ATTACHED MAP or LIST
Reports within project area: 0	None
Reports within ¼-mile radius: 1	SEE ATTACHED MAP or LIST

Resource Database Printout (list): enclosed not requested nothing listed
Resource Database Printout (details): enclosed not requested nothing listed
Resource Digital Database (spreadsheet): enclosed not requested nothing listed
Report Database Printout (list): enclosed not requested nothing listed
Report Database Printout (details): enclosed not requested nothing listed
Report Digital Database (spreadsheet): enclosed not requested nothing listed
Resource Record Copies: enclosed not requested nothing listed
Report Copies: enclosed not requested nothing listed

OHP Built Environment Resources Directory (BERD) 2019: available online; please go to https://ohp.parks.ca.gov/?page_id=30338

Archaeo Determinations of Eligibility 2012: enclosed not requested nothing listed

Historical Maps: not available at SCCIC; please go to

<https://ngmdb.usgs.gov/topoview/viewer/#4/39.98/-100.02>

Ethnographic Information: not available at SCCIC

Historical Literature: not available at SCCIC

GLO and/or Rancho Plat Maps: not available at SCCIC

Caltrans Bridge Survey: not available at SCCIC; please go to

<http://www.dot.ca.gov/hq/structur/strmaint/historic.htm>

Shipwreck Inventory: not available at SCCIC; please go to

http://shipwrecks.slc.ca.gov/ShipwrecksDatabase/Shipwrecks_Database.asp

Soil Survey Maps: (see below) not available at SCCIC; please go to

<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System,

Isabela Kott

Isabela Kott
Assistant Coordinator, GIS Program Specialist

Digitally signed by Isabela Kott
Date: 2022.02.04 15:30:53 -08'00'

Enclosures:

(X) Covid-19 Emergency Protocols for San Bernardino County Records Searches – 2 pages

(X) Custom Maps – 1 page

(X) Resource Digital Database (spreadsheet) – 2 lines

(X) Report Digital Database (spreadsheet) – 1 line

(X) Resource Record Copies – (archaeological in project area only, all non-archaeological) 52 pages

Attachment 2: Photographs



Photograph 1: View over proposed Project/Direct-Impact APE, monopole and enclosure location, view to north



Photograph 2: View over proposed Project/Direct-Impact APE, monopole and enclosure location, view to east



Photograph 3: View over proposed Project/Direct-Impact APE, monopole and enclosure location, view to south



Photograph 4: View over proposed Project/Direct-Impact APE, monopole and enclosure location, along east-west power/telco conduit route toward Belleflower Street, view to west



Photograph 5: View over proposed Project/Direct-Impact APE, west end of east-west power/telco conduit route adjacent to Belleflower Street, view to north



Photograph 6: View over proposed Project/Direct-Impact APE, west end of east-west power/telco conduit route adjacent to Belleflower Street, view to west



Photograph 7: View over proposed Project/Direct-Impact APE, north-south power/telco conduit route adjacent to Belleflower Street, view to south



Photograph 8: View over proposed Project/Direct-Impact APE, west end of east-west power/telco conduit route adjacent to Belleflower Street, along east-west conduit route toward proposed monopole and enclosure location, view to east

SOURCE DOCUMENT 4

**Native American Consultation
January 12, 2022**

Penny Eischer

From: towernotifyinfo@fcc.gov
Sent: Friday, November 26, 2021 12:01 AM
To: Penny Eischer
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #7956241

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY - jmann@easternshoshone.org - 307-335-2081 - electronic mail

Exclusions: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please utilize our ESTHPO website for online submittals. Our website address is: <http://www.esthpo.com>. Please navigate to our Services page. On the services page there will be a Submittal button under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where can submit relevant project files for our consultation review.

Your submission should include:

Appropriate SHPO determination or response letter Cultural Resource Report and or Archaeological Survey Report
Photographic project site documentation Topographic or Quadrangle Maps Site Plans/Construction Drawings FCC Forms 620 and 621 Lat/Long Coordinates for the proposed project.
Project Coordinator Contact Information

Our 30-day review period will commence once all project details have been submitted into our online database. If you have any questions, please feel free to contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin, sdurgin@easternshoshone.org or by phone at: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, New Mexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

2. Acting Director Bryan Etsitty - Colorado River Indian Tribes - 26600 Mohave Road Parker, AZ - anita.flores@crit-nsn.gov - 928-669-5822 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Colorado River Indian Tribes within 30 days after notification through TCNS, the Colorado River Indian Tribes has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Colorado River Indian Tribes in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

3. Culture Society Director Linda D Otero - Fort Mojave Indian Tribe - AhaMakav Cultural Society (PO Box: 5990) Mohave Valley, AZ - lindaotero@fortmojave.com - 928-768-4475 - electronic mail and regular mail

4. Chairman Candace Bear - Skull Valley Band Goshute - 1198 N Main St Tooele, UT -
candaceb@svgoshutes.com; candaceb@svgoshutes.com - 435-882-4532 - electronic mail and regular mail
Exclusions: Montana And Associates LLC does not contract for Skull Valley Band of Goshute any longer. Thank you.

If the applicant/tower builder receives no response from the Skull Valley Band Goshute within 30 days after notification through TCNS, the Skull Valley Band Goshute has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the Skull Valley Band Goshute in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. Cultural Center Director Bridget Sandate - Chemehuevi Tribe - (PO Box: 1976) Havasu Lake, CA - cultural@cit-nsn.gov - 760-858-1115 - electronic mail

If the applicant/tower builder receives no response from the Chemehuevi Tribe within 30 days after notification through TCNS, the Chemehuevi Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the Chemehuevi Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

6. Attorney Montana & Associates LLC - Northwestern Band of Shoshone Nation - N 12923 N. Prairie Rd Osseo, WI - Northwesternbandshoshonetcnsfcc@outlook.com; garymontana@montanaandassociates.com - 715-597-6464 - electronic mail
Exclusions: Northwestern Band of Shoshone as of 2/19/2020 will not be reviewing colocations of antennas on buildings.

7. Cultural Resource Analyst Ryan Nordness - San Manuel Band of Mission Indians - 26569 Community Center Drive Highland, CA - Ryan.Nordness@sanmanuel-nsn.gov - 909-838-4053 - electronic mail

8. Chairman Shane Chapparosa - Los Coyotes Reservation - (PO Box: 189) Warner Springs, CA - los_coyotes@ymail.com; loscoyotes_ta@yahoo.com - 760-782-0711 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Los Coyotes Reservation within 30 days after notification through TCNS, the Los Coyotes Reservation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Los Coyotes Reservation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

9. Tribal Historic Preservation Officer Ann Brierty - Morongo Band of Mission Indians - 12700 Pumarra Road Banning, CA - thpo@morongo-nsn.gov; abrierty@morongo-nsn.gov - 951-755-5259 - electronic mail and regular mail

10. Cultural Clerk Chris Devers - Pauma/Yuima Band of Mission Indians - (PO Box: 369) Pauma Valley, CA - cultural@pauma-nsn.gov - 760-742-1289 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Pauma/Yuima Band of Mission Indians within 30 days after notification through TCNS, the Pauma/Yuima Band of Mission Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Pauma/Yuima Band of Mission Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

11. Cultural Resources Coordinator John Gomez - Ramona Band of Cahuilla - (PO Box: 391372) Anza, CA - jgomez@ramona-nsn.gov - 951-941-4943 - electronic mail

12. Director of Cultural Resources Joseph Ontiveros - Soboba Band of Luiseno Indians - 23906 Soboba Road (PO Box: 487) San Jacinto, CA - Ishaker@soboba-nsn.gov - 951-654-5544 - electronic mail

13. Tribal Historic Preservation Officer Anthony L Madrigal Jr - Twenty Nine Palms Band of Mission Indians - 46-200 Harrison Place Coachella, CA - TNPConsultation@29palmsbomi-nsn.gov; sbliss@29palmsbomi-nsn.gov - 760-775-3259 - electronic mail and regular mail

Exclusions: Anthony Madrigal, Jr., Tribal Historic Preservation Officer TNPConsultation@29palmsbomi-nsn.gov. Please call (760) 863-2489, if you have any questions.

14. Chairman White Dove Kennedy - Timbisha Shoshone Tribe - 621 West Line St. - Suite 109 (PO Box: 1779) Bishop, CA - administrator@timbisha.com - 760-872-3614 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Timbisha Shoshone Tribe within 30 days after notification through TCNS, the Timbisha Shoshone Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Timbisha Shoshone Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

The notification that you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA unless the project is excluded from SHPO review under Section III D or E of the NPA.

15. Deputy SHPO William Collins - Arizona State Parks - 1300 West Washington Phoenix, AZ -
wcollins@pr.state.az.us - 602-542-4174 - electronic mail

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please contact the FCC by emailing tcnshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/19/2021
Notification ID: 241192
Excluded from SHPO Review: No
Tower Owner Individual or Entity Name: AT&T
Consultant Name: Kerry Willoughby
Street Address: 9976 Peak Lookout Street
City: Las Vegas
State: NEVADA
Zip Code: 89178
Phone: 702-614-4431
Email: pennyischer@aceenvironmentalllc.com

Structure Type: POLE - Any type of Pole
Latitude: 34 deg 30 min 28.1 sec N
Longitude: 117 deg 24 min 53.6 sec W
Location Description: Palmdale Road - CSL05972

City: Adelanto
State: CALIFORNIA
County: SAN BERNARDINO
Detailed Description of Project:
Ground Elevation: 959.2 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 982.1 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic Help Request form located on the FCC's website at:

<https://www.fcc.gov/wireless/available-support-services>

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

NATIVE AMERICAN HERITAGE COMMISSION

January 12, 2022

Penelope Eischer
Ace Environmental, LLC

Via Email to: PennyEischer@AceEnvironmentalLLC.com

Re: CSL05972 Project, San Bernardino County

Dear Ms. Eischer:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Sara Dutschke
Miwok

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

**Native American Heritage Commission
Native American Contact List
San Bernardino County
1/12/2022**

Morongo Band of Mission Indians

Robert Martin, Chairperson
12700 Pumarra Road
Banning, CA, 92220
Phone: (951) 755 - 5110
Fax: (951) 755-5177
abrierty@morongo-nsn.gov

Cahuilla
Serrano

Morongo Band of Mission Indians

Ann Brierty, THPO
12700 Pumarra Road
Banning, CA, 92220
Phone: (951) 755 - 5259
Fax: (951) 572-6004
abrierty@morongo-nsn.gov

Cahuilla
Serrano

Quechan Tribe of the Fort Yuma Reservation

Manfred Scott, Acting Chairman
Kw'ts'an Cultural Committee
P.O. Box 1899
Yuma, AZ, 85366
Phone: (928) 750 - 2516
scottmanfred@yahoo.com

Quechan

Quechan Tribe of the Fort Yuma Reservation

Jill McCormick, Historic
Preservation Officer
P.O. Box 1899
Yuma, AZ, 85366
Phone: (760) 572 - 2423
historicpreservation@quechantribe.com

Quechan

San Fernando Band of Mission Indians

Donna Yocum, Chairperson
P.O. Box 221838
Newhall, CA, 91322
Phone: (503) 539 - 0933
Fax: (503) 574-3308
ddyocum@comcast.net

Kitanemuk
Vanyume
Tataviam

San Manuel Band of Mission Indians

Jessica Mauck, Director of
Cultural Resources
26569 Community Center Drive
Highland, CA, 92346
Phone: (909) 864 - 8933
Jessica.Mauck@sanmanuel-nsn.gov

Serrano

Serrano Nation of Mission Indians

Mark Cochrane, Co-Chairperson
P. O. Box 343
Patton, CA, 92369
Phone: (909) 528 - 9032
serranonation1@gmail.com

Serrano

Serrano Nation of Mission Indians

Wayne Walker, Co-Chairperson
P. O. Box 343
Patton, CA, 92369
Phone: (253) 370 - 0167
serranonation1@gmail.com

Serrano

Twenty-Nine Palms Band of Mission Indians

Darrell Mike, Chairperson
46-200 Harrison Place
Coachella, CA, 92236
Phone: (760) 863 - 2444
Fax: (760) 863-2449
29chairman@29palmsbomi-nsn.gov

Chemehuevi

Twenty-Nine Palms Band of Mission Indians

Anthony Madrigal, Tribal Historic
Preservation Officer
46-200 Harrison Place
Coachella, CA, 92236
Phone: (760) 775 - 3259
amadrigal@29palmsbomi-nsn.gov

Chemehuevi

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed CSL05972 Project, San Bernardino County.

Penny Eischer

From: Gary Montana <garymontana@montanaandassociates.com>
Sent: Tuesday, February 15, 2022 9:25 AM
To: Penny Eischer
Subject: Re: CSL05972 - TCNS# 241192 - Northwestern Tribal Consult

No adverse effects

On 2/12/2022 4:26 PM, Penny Eischer wrote:

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Attorney Montana & Associates, LLC:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer
Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PenneyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>
Sent: Monday, February 14, 2022 6:44 AM
To: Penny Eischer
Subject: RE: CSL05972 - TCNS# 241192 - Quechan Tribal Consult

This email is to inform you that we have no comments on this project. We defer to the more local Tribes and support their decisions on the projects.

From: Penny Eischer [mailto:pennyeischer@aceenvironmental.com]
Sent: Saturday, February 12, 2022 3:35 PM
To: historicpreservation@quechantribe.com
Subject: CSL05972 - TCNS# 241192 - Quechan Tribal Consult

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Ms. Jill McCormick, HPO:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: See attached diagrams. The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

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Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer
Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178

Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentallc.com
WBE – Women’s Business Enterprise



Virus-free. www.avast.com

Penny Eischer

From: towernotifyinfo@fcc.gov
Sent: Thursday, December 9, 2021 2:49 PM
To: Penny Eischer
Cc: tcns.fccarchive@fcc.gov
Subject: Reply to Proposed Tower Structure (Notification ID: 241192) - Email ID #7973929

Dear Kerry Willoughby,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Cultural Resource Analyst Ryan Nordness of the San Manuel Band of Mission Indians in reference to Notification ID #241192:

Hello,

This project is located within Serrano ancestral territory and is of interest to the tribe. Please provide the following, if required for this project:

- Cultural report
- Paleontological report (if required for this project)
- Geotechnical report (if required for this project)
- Project plans showing the horizontal and vertical extent of proposed disturbance

This provision will assist the tribe during consultation.

Regards,
Jamie Nord
Cultural Resources Technician
jamie.nord@sanmanuel-nsn.gov

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 11/19/2021
Notification ID: 241192
Tower Owner Individual or Entity Name: AT&T
Consultant Name: Kerry Willoughby
Street Address: 9976 Peak Lookout Street
City: Las Vegas
State: NEVADA

Zip Code: 89178
Phone: 702-614-4431
Email: pennyischer@aceenvironmentalllc.com

Structure Type: POLE - Any type of Pole
Latitude: 34 deg 30 min 28.1 sec N
Longitude: 117 deg 24 min 53.6 sec W
Location Description: Palmdale Road - CSL05972
City: Adelanto
State: CALIFORNIA
County: SAN BERNARDINO

Detailed Description of Project:
Ground Elevation: 959.2 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 982.1 meters above mean sea level

Penny Eischer

From: Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>
Sent: Monday, February 14, 2022 12:44 PM
To: Penny Eischer
Cc: Ryan Nordness
Subject: RE: CSL05972 - TCNS# 241192 - San Manuel Band of Mission Indians

Hello Penny,

Thank you for providing the attached documentation, as requested within TCNS 241192, on December 09th, 2021, and for affording SMBMI the opportunity to review the materials. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the tribe. However, SMBMI does not have any concerns with the proposed project, as planned, at this time. As a result, SMBMI requests that the following language be made a part of the project's permit/NTP conditions:

1. If human remains or funerary objects are encountered during any activities associated with the project, work 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.
2. In the event that any pre-contact cultural resources are discovered during project activities, all work 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, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, in order to provide Tribal input. The archaeologist shall complete an isolate/site record for the find and submit this document to the Lead Agency for dissemination to the San Manuel Band of Mission Indians.
3. If eligible pre-contact resources are discovered, and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan and a Discovery and Monitoring Plan. Drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment. The Lead Agency or designated POC shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.

Note: San Manuel Band of Mission Indians realizes that there may be additional tribes claiming cultural affiliation to the area; however, San Manuel Band of Mission Indians can only speak for itself. The tribe has no objection if the agency, developer, or archaeologist wishes to consult with other tribes in addition to SMBMI and if the Lead Agency wishes to revise the conditions to recognize additional tribes.

This communication concludes SMBMI's input on this project, at this time, and no additional consultation is required unless there is an unanticipated discovery of cultural resources during project implementation. If you should have any questions, please do not hesitate to contact me at your convenience.

Respectfully,
Jamie Nord

From: Penny Eischer <pennyeischer@aceenvironmentalllc.com>
Sent: Saturday, February 12, 2022 2:43 PM
To: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>
Cc: Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>
Subject: CSL05972 - TCNS# 241192 - San Manuel Band of Mission Indians

Hello,

Per your TCNS Response Email ID# 7973929, please find attached the cultural report for this proposed new 75' monotree.

Thank you,

Penelope Eischer
Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PennyEischer@AceEnvironmentallc.com

WBE – Women's Business Enterprise

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For suspicious emails please contact the IT Service Desk at extension 4500 or (909) 863-5700.

If you are on your Outlook client, report the suspicious email by clicking on Report Phish icon in your Outlook toolbar.

If you are on a mobile device, forward the suspicious email to spam@sanmanuel.com.

From: Penny Eischer <pennyeischer@aceenvironmentallic.com>
Sent: Saturday, February 12, 2022 2:43 PM
To: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>
Cc: Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>
Subject: CSL05972 - TCNS# 241192 - San Manuel Band of Mission Indians

Hello,

Per your TCNS Response Email ID# 7973929, please find attached the cultural report for this proposed new 75' monotree.

Thank you,

Penelope Eischer
Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

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If you are on a mobile device, forward the suspicious email to spam@sanmanuel.com.

From: [Jamie Nord](#)
To: [Penny Eischer](#)
Cc: [Ryan Nordness](#)
Subject: RE: CSL05972 - TCNS# 241192 - San Manuel Band of Mission Indians
Date: Monday, February 14, 2022 12:43:00 PM

Hello Penny,

Thank you for providing the attached documentation, as requested within TCNS 241192, on December 09th, 2021, and for affording SMBMI the opportunity to review the materials. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the tribe. However, SMBMI does not have any concerns with the proposed project, as planned, at this time. As a result, SMBMI requests that the following language be made a part of the project's permit/NTP conditions:

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This communication concludes SMBMI's input on this project, at this time, and no additional consultation is required unless there is an unanticipated discovery of cultural resources during project implementation. If you should have any questions, please do not hesitate to contact me at your convenience.

Respectfully,
Jamie Nord

Penny Eischer

From: Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>
Sent: Monday, February 28, 2022 10:36 AM
To: Penny Eischer
Cc: Bonnie Bryant; Jessica Mauck
Subject: RE: CSL05972 - TCNS# 241192 - San Manuel Tribal Consult - Follow Up Email
Attachments: TCNS 241192 Close of Consultation.pdf

Hello Penny

Thank you for reaching out. Our department sent an email on February 14, 2022, closing consultation.. The correspondence is attached to this email. Let me know if you have any questions. Thank you and have a nice day!

Best
Jamie

From: Penny Eischer <pennyeischer@aceenvironmentalllc.com>
Sent: Friday, February 25, 2022 11:32 PM
To: Jessica Mauck <Jessica.Mauck@SanManuel-NSN.Gov>
Cc: Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>
Subject: CSL05972 - TCNS# 241192 - San Manuel Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com

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If you are on a mobile device, forward the suspicious email to spam@sanmanuel.com.

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:40 PM
To: 29chairman@29palmsbomi-nsn.gov
Subject: CSL05972 - TCNS# 241192 - 29 Palms Tribal Consult
Attachments: CSL05972 drawings shortened.pdf; CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Mr. Darrell Mike, Chairperson:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: See attached diagrams. The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenneyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:32 PM
To: amadrigal@29palmsbomi-nsn.gov
Cc: sbliss@29palmsbomi-nsn.gov; TNPConsultation@29palmsbomi-nsn.gov
Subject: CSL05972 - TCNS# 241192 - 29 Palms Tribal Consult
Attachments: CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Mr. Anthony L. Madrigal Jr., THPO:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

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Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenneyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:25 PM
To: lindaotero@fortmojave.com
Subject: CSL05972 - TCNS# 241192 - Fort Mojave Tribal Consult
Attachments: CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Ms. Linda D. Otero, Culture Society Director:

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Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



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9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenneyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:28 PM
To: Ann Brierty
Cc: thpo@morongo-nsn.gov
Subject: CSL05972 - TCNS# 241192 - Morongo Tribal Consult
Attachments: CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Ms. Ann Brierty, THPO and Mr. Robert Martin, Chairperson:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

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Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenelopeEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:27 PM
To: garymontana@montanaandassociates.com
Cc: Northwesternbandshoshonetcnsfcc@outlook.com
Subject: CSL05972 - TCNS# 241192 - Northwestern Tribal Consult
Attachments: CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Attorney Montana & Associates, LLC:

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Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



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9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenneyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 4:08 PM
To: scottmanfred@yahoo.com
Subject: CSL05972 - TCNS# 241192 - Quechan Tribal Consult
Attachments: CSL05972 drawings shortened.pdf; CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Mr. Manfred Scott, Acting Chairman Kw'ts'an Committee:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

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Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



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9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PennyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:35 PM
To: historicpreservation@quechantribe.com
Subject: CSL05972 - TCNS# 241192 - Quechan Tribal Consult
Attachments: CSL05972 drawings shortened.pdf; CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Ms. Jill McCormick, HPO:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

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Proposed Activities: See attached diagrams. The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PenneyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:29 PM
To: jgomez@ramona-nsn.gov
Subject: CSL05972 - TCNS# 241192 - Ramona Tribal Consult
Attachments: CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Mr. John Gomez, Chairperson:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenneyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:36 PM
To: ddyocum@comcast.net
Subject: CSL05972 - TCNS# 241192 - San Fernando Tribal Consult
Attachments: CSL05972 drawings shortened.pdf; CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Ms. Donna Yocum, Chairperson:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: See attached diagrams. The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PennyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:43 PM
To: Ryan Nordness
Cc: Jamie Nord
Subject: CSL05972 - TCNS# 241192 - San Manuel Band of Mission Indians
Attachments: CSL05972 site layout.pdf; CSL05972_Cultural Report_020622.pdf

Hello,

Per your TCNS Response Email ID# 7973929, please find attached the cultural report for this proposed new 75' monotree.

Thank you,

Penelope Eischer
Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:37 PM
To: Jessica Mauck (jmauck@sanmanuel-nsn.gov)
Cc: Jamie Nord
Subject: CSL05972 - TCNS# 241192 - San Manuel Tribal Consult
Attachments: CSL05972 drawings shortened.pdf; CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW

AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Ms. Jessica Mauck, Director of Cultural Resources:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: See attached diagrams. The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer
Project Assistant



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:38 PM
To: serranonation1@gmail.com
Subject: CSL05972 - TCNS# 241192 - Serrano Tribal Consult
Attachments: CSL05972 drawings shortened.pdf; CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Mr. Mark Cochrane, Co-Chairperson and Mr. Wayne Walker, Co-Chairperson:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: See attached diagrams. The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PennyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Saturday, February 12, 2022 2:30 PM
To: lshaker@soboba-nsn.gov
Subject: CSL05972 - TCNS# 241192 - Soboba Tribal Consult
Attachments: CSL05972 site layout.pdf; CSL05972 photos from cultural.pdf

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Dear Mr. Joseph Ontiveros, Director of Cultural Resources:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. This submittal is to determine if you have interest in this site.

Site Location and Description

The project site is located on a vacant lot. See attached site layout map and site photographs.

Proposed Activities: The site includes a proposed new 75' monotree to be located on the parent parcel.

Conclusions

A Cultural Resource Research and Field Survey were performed for this site. The results of the resource research and field survey indicated a finding of No Historic Properties in the Area of Potential Effects (APE) for both the Direct-Impact APE and the Indirect-Impact APE.

Based on the above referenced information, please let ACE know if your Native American Indian Tribe has interest in this site.

Should you have any questions, comments and/or require further clarification, please contact me. Thank you very much.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431

PenneyEischer@AceEnvironmentalllc.com

WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:29 PM
To: amadrigal@29palmsbomi-nsn.gov
Cc: sbliss@29palmsbomi-nsn.gov
Subject: CSL05972 - TCNS# 241192 - 29 Palms Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer **Project Assistant**



Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentallc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:52 PM
To: 29chairman@29palmsbomi-nsn.gov
Subject: CSL05972 - TCNS# 241192 - 29 Palms Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

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Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:30 PM
To: lindaotero@fortmojave.com
Subject: CSL05972 - TCNS# 241192 - Fort Mojave Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:30 PM
To: Ann Brierty
Cc: thpo@morongo-nsn.gov
Subject: CSL05972 - TCNS# 241192 - Morongo Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer **Project Assistant**



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:31 PM
To: jgomez@ramona-nsn.gov
Subject: CSL05972 - TCNS# 241192 - Ramona Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:31 PM
To: ddyocum@comcast.net
Subject: CSL05972 - TCNS# 241192 - San Fernando Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

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Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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9976 Peak Lookout Street
Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentallc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:32 PM
To: Jessica Mauck (jmauck@sanmanuel-nsn.gov)
Cc: Jamie Nord
Subject: CSL05972 - TCNS# 241192 - San Manuel Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

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Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:32 PM
To: serranonation1@gmail.com
Subject: CSL05972 - TCNS# 241192 - Serrano Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: Penny Eischer
Sent: Friday, February 25, 2022 11:33 PM
To: lshaker@soboba-nsn.gov
Subject: CSL05972 - TCNS# 241192 - Soboba Tribal Consult - Follow Up Email

Re: TRIBAL HISTORIC PRESERVATION OFFICE REVIEW – Second Letter for this Site
AT&T CSL05972
TCNS ID# 241192
Near Palmdale Road and Bellflower Street
APN# 3103-481-05-0000
Adelanto, San Bernardino County, CA 92301

Attn: Tribal Historic Preservation Officer:

ACE Environmental, LLC (ACE) is under contract to submit information to the Native American Indian Tribes regarding telecommunications facilities. Please note that this submittal represents the second written follow-up letter to the original TCNS notification for this site. The first post-TCNS follow-up letter e-mailed approximately two weeks ago for this site included multiple color appendices.

The site includes a proposed new 75' monotree.

A Cultural Resource Research and Field Survey indicated no historic properties in the APE.

Should you have any questions please contact. Thank you.

Penelope Eischer
Project Assistant



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Las Vegas, NV 89178
Mobile (702) 526-6044
Phone (702) 614-4431
PennyEischer@AceEnvironmentalllc.com
WBE – Women's Business Enterprise

Penny Eischer

From: towernotifyinfo@fcc.gov
Sent: Thursday, March 17, 2022 6:01 AM
To: Penny Eischer
Cc: tcnsweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #31258

SBA
Kerry Willoughby
9976 Peak Lookout Street
Las Vegas, NV 89178

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's Wireless Infrastructure Second Report and Order (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 03/10/2022 and 03/17/2022. Our contact with these Tribal Nations or NHOs was sent on 03/17/2022.

Thus, as described in the Wireless Infrastructure Second Report and Order (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 15 calendar days of 03/17/2022, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete. If a Tribal Nation or NHO responds that it has concerns about a historic property of traditional religious and cultural significance that may be affected by the proposed construction within the 15 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

You are reminded that Section IX of the NPA imposes independent obligations on an Applicant when a previously unidentified site that may be a historic property, including an archeological property, is discovered during construction or after the completion of review. In such instances, the Applicant must cease construction and promptly notify, among others, any potentially affected Tribal Nation or NHO. A Tribal Nation's or NHO's failure to express interest in participating in pre-construction review of an undertaking does not necessarily mean it is not interested in archeological properties or human remains that may inadvertently be discovered during construction. Hence, an Applicant is still required to notify any potentially affected Tribal Nation or NHO of any such finds pursuant to Section IX or other applicable law.

Sincerely,
Jill Springer
Federal Preservation Officer
Federal Communications Commission
jill.springer@fcc.gov

1) See Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, Second Report and Order, FCC 18-30 (Mar. 30, 2018) (Wireless Infrastructure Second Report and Order).

2) See id. at paras. 111-112.

LIST OF PROPOSED COMMUNICATIONS TOWERS

TCNS# 217734 Referred Date: 03/16/2022 Location: 201 Highway 18 - IE04945A, San Bernardino, CA

Detailed Description of Project:

Tribe Name: Northwestern Band of Shoshone Nation

TCNS# 236174 Referred Date: 03/16/2022 Location: Motorcross Road - SV13593A, Ridgecrest, CA

Detailed Description of Project:

Tribe Name: Northwestern Band of Shoshone Nation

TCNS# 238950 Referred Date: 03/16/2022 Location: 30977 Cerro Noroeste Road - SV00535A, Maricopa, CA

Detailed Description of Project:

Tribe Name: Northwestern Band of Shoshone Nation

TCNS# 236794 Referred Date: 03/16/2022 Location: 2701 Manhattan Beach Boulevard - LA82597A, Redondo Beach, CA

Detailed Description of Project:

Tribe Name: Northwestern Band of Shoshone Nation

TCNS# 241879 Referred Date: 03/16/2022 Location: 831 Colton Avenue - IE94983A, Colton, CA

Detailed Description of Project:

Tribe Name: Eastern Shoshone Tribe

Tribe Name: Fort Mojave Indian Tribe

Tribe Name: Morongo Band of Mission Indians

Tribe Name: Ramona Band of Cahuilla

Tribe Name: Soboba Band of Luiseno Indians

Tribe Name: Twenty Nine Palms Band of Mission Indians

TCNS# 238783 Referred Date: 03/16/2022 Location: 4159 Costero Risco - CLL01419, San Clemente, CA

Detailed Description of Project:

Tribe Name: Eastern Shoshone Tribe

TCNS# 242794 Referred Date: 03/13/2022 Location: 3696 Norwood Avenue - CA40645T, San Jose, CA

Detailed Description of Project:

Tribe Name: Eastern Shoshone Tribe

TCNS# 241466 Referred Date: 03/13/2022 Location: 1257 Brooks Street - IE84706A, Ontario, CA

Detailed Description of Project:

Tribe Name: Eastern Shoshone Tribe

Tribe Name: Fort Mojave Indian Tribe

Tribe Name: Morongo Band of Mission Indians

Tribe Name: Ramona Band of Cahuilla

Tribe Name: Soboba Band of Luiseno Indians

Tribe Name: Twenty Nine Palms Band of Mission Indians

TCNS# 241192 Referred Date: 03/13/2022 Location: Palmdale Road - CSL05972, Adelanto, CA

Detailed Description of Project:

Tribe Name: Eastern Shoshone Tribe

Tribe Name: Fort Mojave Indian Tribe

Tribe Name: Morongo Band of Mission Indians

Tribe Name: Ramona Band of Cahuilla

Tribe Name: Soboba Band of Luiseno Indians

Tribe Name: Twenty Nine Palms Band of Mission Indians

TCNS# 188521 Referred Date: 03/13/2022 Location: 42360 Adams St. - IE24635, Bermuda Dunes, CA

Detailed Description of Project:

- Tribe Name: Eastern Shoshone Tribe
- Tribe Name: Fort Mojave Indian Tribe
- Tribe Name: La Posta Band of Mission Indians
- Tribe Name: Morongo Band of Mission Indians
- Tribe Name: Pechanga Band of Luiseno Indians
- Tribe Name: Ramona Band of Cahuilla
- Tribe Name: Torres-Martinez Desert Cahuilla Indians
- Tribe Name: Twenty Nine Palms Band of Mission Indians
- Tribe Name: Augustine Band of Cahuilla Indians
- Tribe Name: Campo Band of Mission Indians
- Tribe Name: Cocopah Indian Tribe

TCNS# 241473 Referred Date: 03/13/2022 Location: 1347 Sapphire Avenue - IE84436A, Mentone, CA

Detailed Description of Project:

- Tribe Name: Eastern Shoshone Tribe
- Tribe Name: Fort Mojave Indian Tribe
- Tribe Name: Morongo Band of Mission Indians
- Tribe Name: Ramona Band of Cahuilla
- Tribe Name: Soboba Band of Luiseno Indians
- Tribe Name: Twenty Nine Palms Band of Mission Indians

LEGEND:

* - Notification numbers are assigned by the Commission staff for sites where initial contact was not made through TCNS.

SOURCE DOCUMENT 5

Flood Insurance Rate Map

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations (BFEs)** and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations tables in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations tables should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was Universal Transverse Mercator (UTM) zone 11 North. The **horizontal datum** was NAD 83, GRS80 spheroid. Differences in datum, spheroid, projection or UTM zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <http://www.ngs.noaa.gov> or contact the National Geodetic Survey at the following address:

NGS Information Services
NOAA, NNGS12
National Geodetic Survey
SSMC-3, #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit its website at <http://www.ngs.noaa.gov>.

Base map information shown on this FIRM was derived from digital orthophotography collected by the U.S. Department of Agriculture Farm Service Agency. This imagery was flown in 2005 and was produced with a 1-meter ground sample distance.

This map may reflect more detailed and up-to-date stream channel configurations than those shown on the previous FIRM for this jurisdiction. The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study Report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

Contact the **FEMA Map Service Center** at 1-800-358-9616 for information on available products associated with this FIRM. Available products may include previously issued Letters of Map Change, a Flood Insurance Study report, and/or digital versions of this map. The FEMA Map Service Center may also be reached by Fax at 1-800-358-9620 and its website at <http://msc.fema.gov>.

If you have **questions about this map** or questions concerning the National Flood Insurance Program in general, please call 1-877-FEMA MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov>.



LEGEND

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently identified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X Areas determined to be outside the 0.2% annual chance floodplain.
ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

- 1% annual chance floodplain boundary
- 0.2% annual chance floodplain boundary
- Floodway boundary
- Zone D boundary
- CBRS and OPA boundary
- Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
- Base Flood Elevation line and value; elevation in feet* (EL 987)
- Base Flood Elevation value where uniform within zone; elevation in feet*

* Referenced to the North American Vertical Datum of 1988

- Cross section line
- Transect line
- Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere
- 1000-meter Universal Transverse Mercator grid values, zone 11N
- 600000 FT 5000-foot grid ticks; California State Plane coordinate system, zone V (FIPSZONE 0405), Lambert Conformal Conic projection
- DX5510 x Bench mark (see explanation in Notes to Users section of this FIRM panel)
- M1.5 River Mile

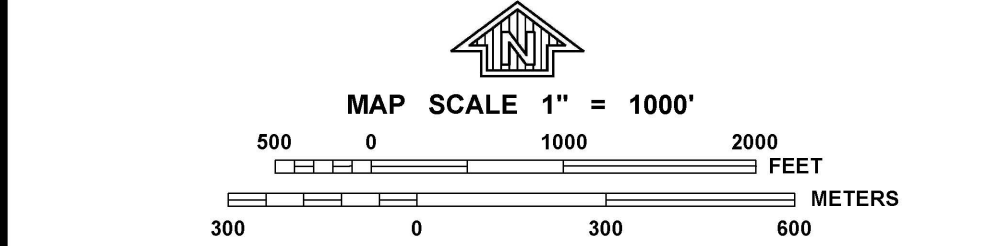
MAP REPOSITORY
Refer to listing of Map Repositories on Map Index

EFFECTIVE DATE OF COUNTY-WIDE FLOOD INSURANCE RATE MAP
March 18, 1998

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL
August 28, 2008 - to update corporate limits, to change Base Flood Elevations and Special Flood Hazard Areas, to update map format, to add roads and road names, and to incorporate previously issued Letters of Map Revision.

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-538-6620.



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 5795H

FIRM
FLOOD INSURANCE RATE MAP

SAN BERNARDINO COUNTY, CALIFORNIA AND INCORPORATED AREAS
PANEL 5795 OF 9400
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:	COMMUNITY	NUMBER	PANEL	SUFFIX
	ADELANTO, CITY OF	060639	5795	H
	SAN BERNARDINO COUNTY	060270	5795	H
	VICTORVILLE, CITY OF	065068	5795	H

Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.

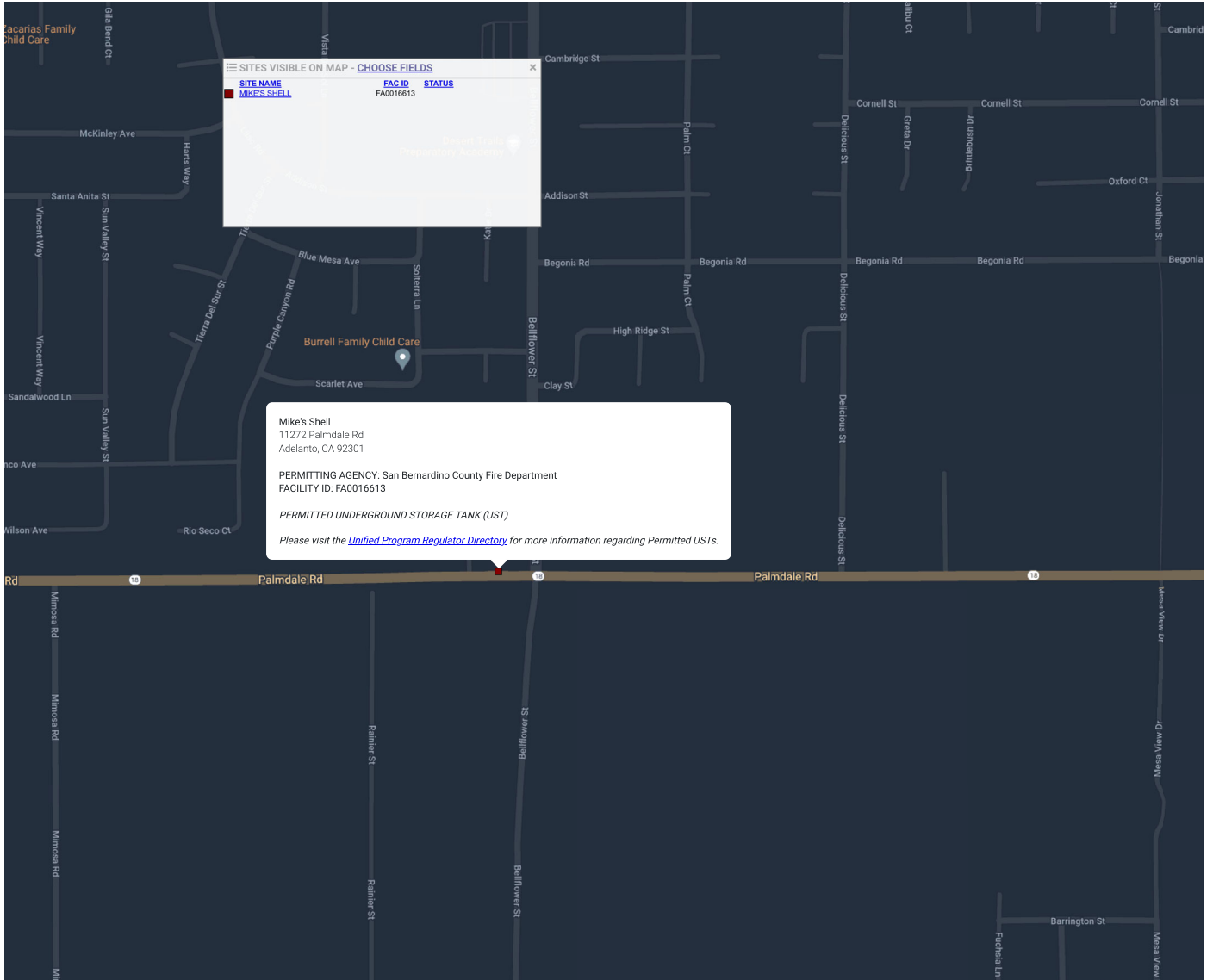
MAP NUMBER
06071C5795H

MAP REVISED
AUGUST 28, 2008

Federal Emergency Management Agency

SOURCE DOCUMENT 6

Geotracker Hazardous Materials Database



SOURCE DOCUMENT 7

Photo Simulations

AERIAL MAP



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DRAFTLINK
SIMS@DRAFTLINK.COM



24310 MOULTON PARKWAY
SUITE 0 #1009
LAGUNA HILLS, CA 92637-3306
CONTACT: BRETT SMIRL



CSL05972
GURU
PALMDALE ROAD,
ADELANTO, CA 92301

VIEW	SHEET
A	1 / 3

AERIAL MAP



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 SUITE 0 #1009
 LAGUNA HILLS, CA 92637-3306
 CONTACT: BRETT SMIRL



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VIEW	SHEET
B	2 / 3

AERIAL MAP



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 LAGUNA HILLS, CA 92637-3306
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VIEW	SHEET
C	3 / 3