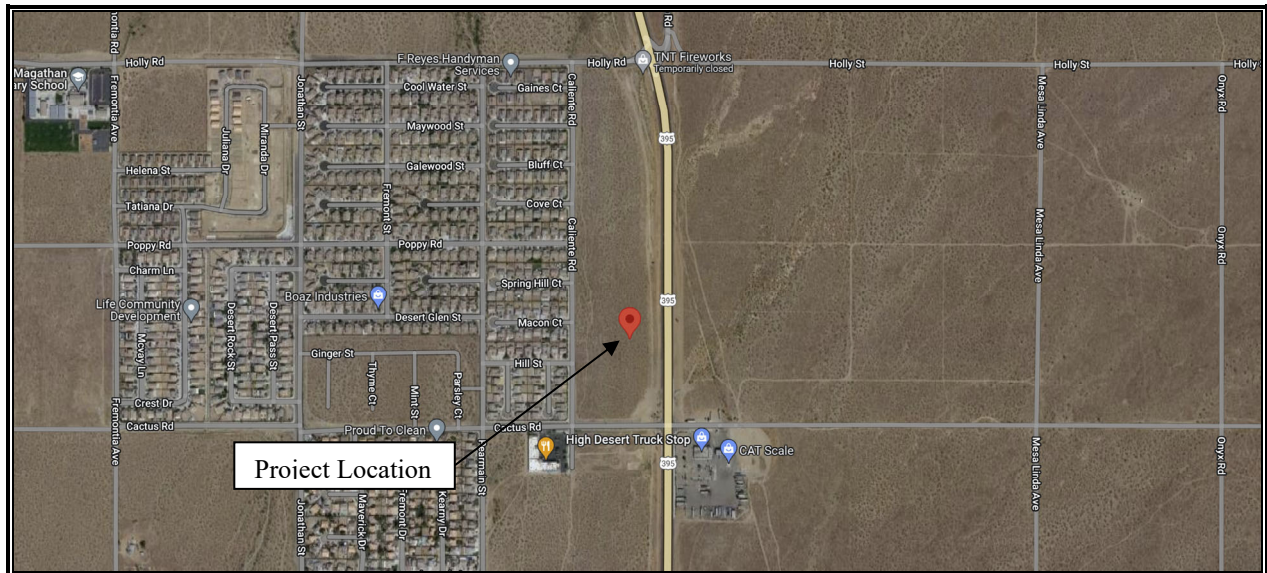


Public Review Draft
CEQA INITIAL STUDY AND MITIGATED NEGATIVE
DECLARATION

AT&T New Tower
NW of Cactus Road & Hwy 395
Adelanto, San Bernardino County, CA 92301

CSL00199, Woolsey
FA#: 13014374, PACE#: MRLOS015323, USID#: 281535

SCH# pending



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

Prepared For:



February 22, 2023



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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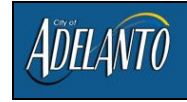


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Attachments:

Drawings

Source Document 1: City of Adelanto General Plan and Elements (Not attached)

Source Document 2: Focused Survey for Agassiz's Desert Tortoise, Habitat Assessments for Burrowing Owl and Mohave Ground Squirrel, and General Biological Resource Assessment

Source Document 3: Cultural Resources Assessment

Source Document 4: Native American Consultation Documentation

Source Document 5: Flood Insurance Rate Map (FIRM)

Source Document 6: Geotracker Hazardous Materials Database

Source Document 7: Photo Simulations



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 west of Highway 395, east of Caliente Road and north of Cactus Road 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

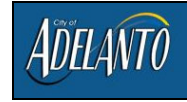
Certain documents are incorporated by reference into this environmental document pursuant to CEQA Guidelines §15150. Where a document is referenced, its pertinent sections will be briefly summarized in the discussions in this environmental report. These documents are also identified in the Initial Study 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 will be required to comply 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 February 10, 2023, 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 February 10, 2023. 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 Hirsch
760-246-2300

Project Applicant:

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

Coastal Business Group (Site Acquisition)
Brett Smirl
909-202-1596



CEQA Environmental Consultants:

Impact 7G, Inc.

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

Impact 7G

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

Circle Mountain Biological Consultants, Inc.

Biological Resource Assessment
Ed LaRue, Sharon Dougherty
PO Box 3197
Wrightwood, CA 92397
760-249-4948

Duke Cultural Resources Management LLC.

Cultural Resources Assessment
Curt Duke M.A., RPA
18 Technology Dr.
Irvine, CA 92618
949-356-6660

Engineering Consultants:

Bechtel Communications

Ron Vanderwal
714-343-0931

DCI Pacific

Architecture/Engineering/Consulting
26 Executive Park, Suite 170
Irvine, CA 92614
949-475-1000

Property Owner:

Woolsey Roy B. Trust
26649 Snell Lane
Los Altos, CA 94022
Roy B. Woolsey
650-941-5236



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 Cactus Road, east of Highway 395 and west of Caliente Road, in the City of Adelanto, San Bernardino County, California. The new AT&T facility is commonly called CSL00199. A detailed project description is provided below.

2.2 Project Location

The undeveloped property is currently owned by the Woolsey Roy B. Trust and is identified by Assessor Parcel Number (APN) 3128-531-14-0000 with a total area of approximately 15 acres (henceforth called “Parent Property”). The proposed AT&T mono-eucalyptus and equipment will be located approximately 427 feet east from the closest residential area along Caliente Road, approximately 171 feet west of Highway 395, and approximately 600 feet north of Cactus Road, in the City of Adelanto, San Bernardino County, California (Project Site). U.S. Highway 395 is a north-south trending highway in this area and intersects with east-west trending Cactus Road to the south. Interstate 15 is located further to the east. The Project Site will be located along the north-eastern boundary of the parent property (latitude: N34.537584 degrees, longitude: W-117.400317 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 the NE ¼ of Section 9 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 3,005 feet above mean sea level. The property has a Zoning designation of Commercial and is currently vacant.

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-four foot, two inch (24’-2”) by thirty-four foot, ten inch (34’-10”) lease area (842 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 one hundred seventy-one feet (171’) non-exclusive vehicular path which will have a gravel base. The access



will enter from Highway 395 to the east. Approximately two hundred forty feet (240') of electrical and telco trenching will be required from the proposed site eastward toward Highway 395, then northerly along the Highway 395 right of way, to an existing utility pole for AT&T's point of connection (POC). The trenching will follow the proposed access path.

Construction

Construction access is also proposed from the Highway 395 right of way. A short-term impact of this project will likely be the inconveniences created for short periods of time on traffic flows along Highway 395. 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 the Highway 395 right of way. Semi-trucks carrying the mono-eucalyptus and equipment will enter and exit from Highway 395 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 west of the project site will not be impacted.

2.4 Existing Setting and Surrounding Areas

The 15-acre parent property is primarily undeveloped level land. 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 northeast. At least two (2) Joshua Trees appear to be located west of the site, approximately 50 feet southwest and 118 feet southwest respectively. Based on review of the drawings provided, the Joshua trees do not appear to be impacted as a result of this project.

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 to the north is undeveloped and vacant land with natural vegetation. The next closest improved road is Holly Road approximately 4,000 lineal feet to the north.

South: The property to the south is undeveloped and vacant land with natural vegetation. Cactus Road is located approximately 600 south and is developed as a two laned paved road with center turn-lane and curb and gutters west of Caliente Road. East



of Caliente Road, Cactus Road is paved but has no curbs, gutters or street lights. Southwest of Caliente and Cactus Roads is a small commercial center with paved parking, landscaping and lighting.

East: Property to the east consists of vacant, undeveloped land with natural vegetation. Highway 395 is located approximately 171 feet east and will provide access to the proposed lease area. The east side of Highway 395 is located in the City of Victorville. Further southeast is a commercial service station.

West: The property to the west is undeveloped and vacant land with natural vegetation. Further west of the proposed project is Caliente Road. Single family residential uses are located west of Caliente Road. The closest residence is approximately 427 feet west from the project.

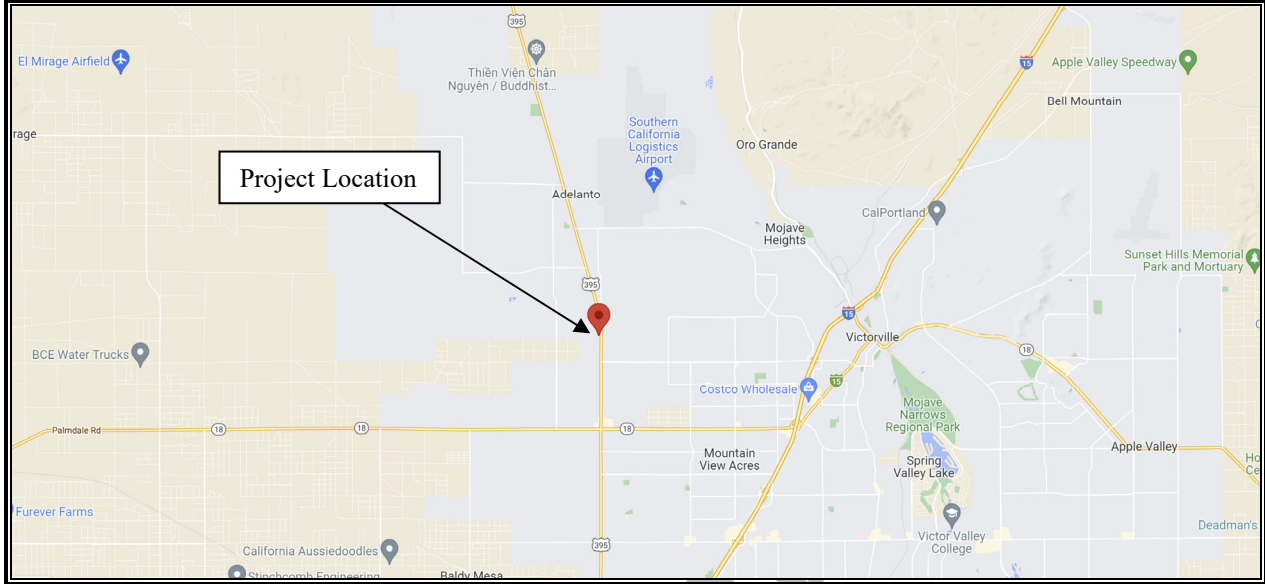
Caliente Road is a paved two-laned local street trending north-south in this area, with curb, gutter, sidewalk and overhead street lighting only on the west side of the road. Caliente Road is improved with storm drains, water and sewer facilities to service the residential area. Cactus Road is a paved two-laned local road with center turns lanes trending in an east-west direction. The portion of Cactus Road west of Caliente Road is improved with curbs, gutters, sidewalks, overhead street lighting, water, sewer and storm drain facilities. Cactus Road east of Caliente Road is still a two laned road but with no curbs, gutters or sidewalks. Highway 395 borders the eastern portion of the parent property and trends in a north-south direction. Highway 395 is a paved 4-laned major highway with center turn lanes, right-turn lanes, bikeways, overhead street lighting, underground utilities, signage and parking in some area.

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.

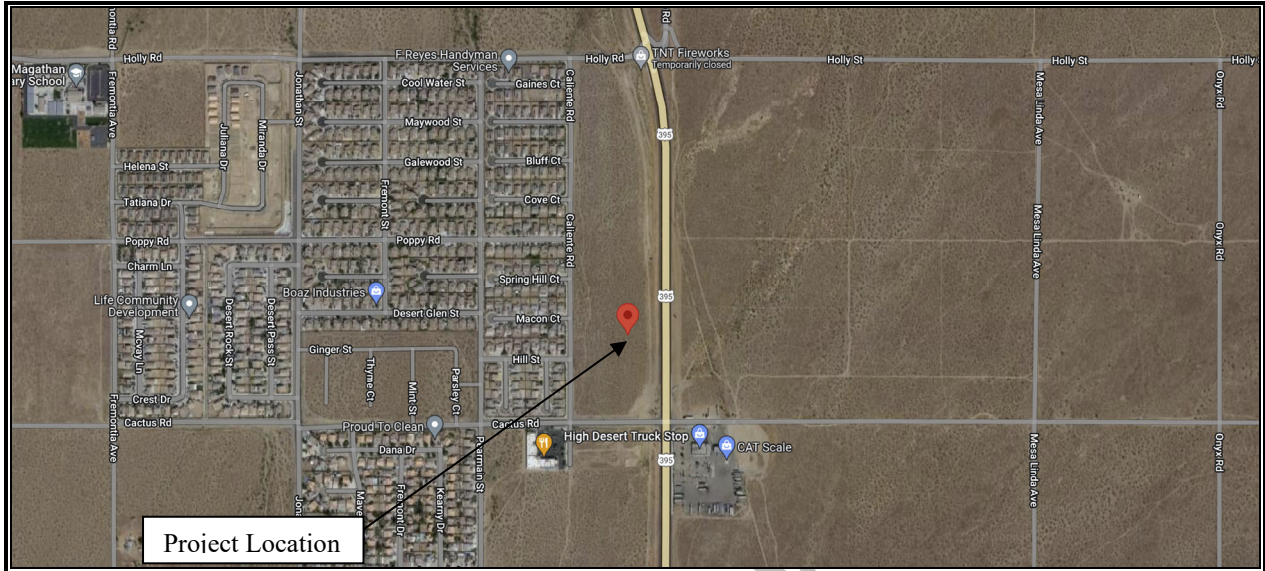


Source: Google Maps

Regional Location Map



Public Review

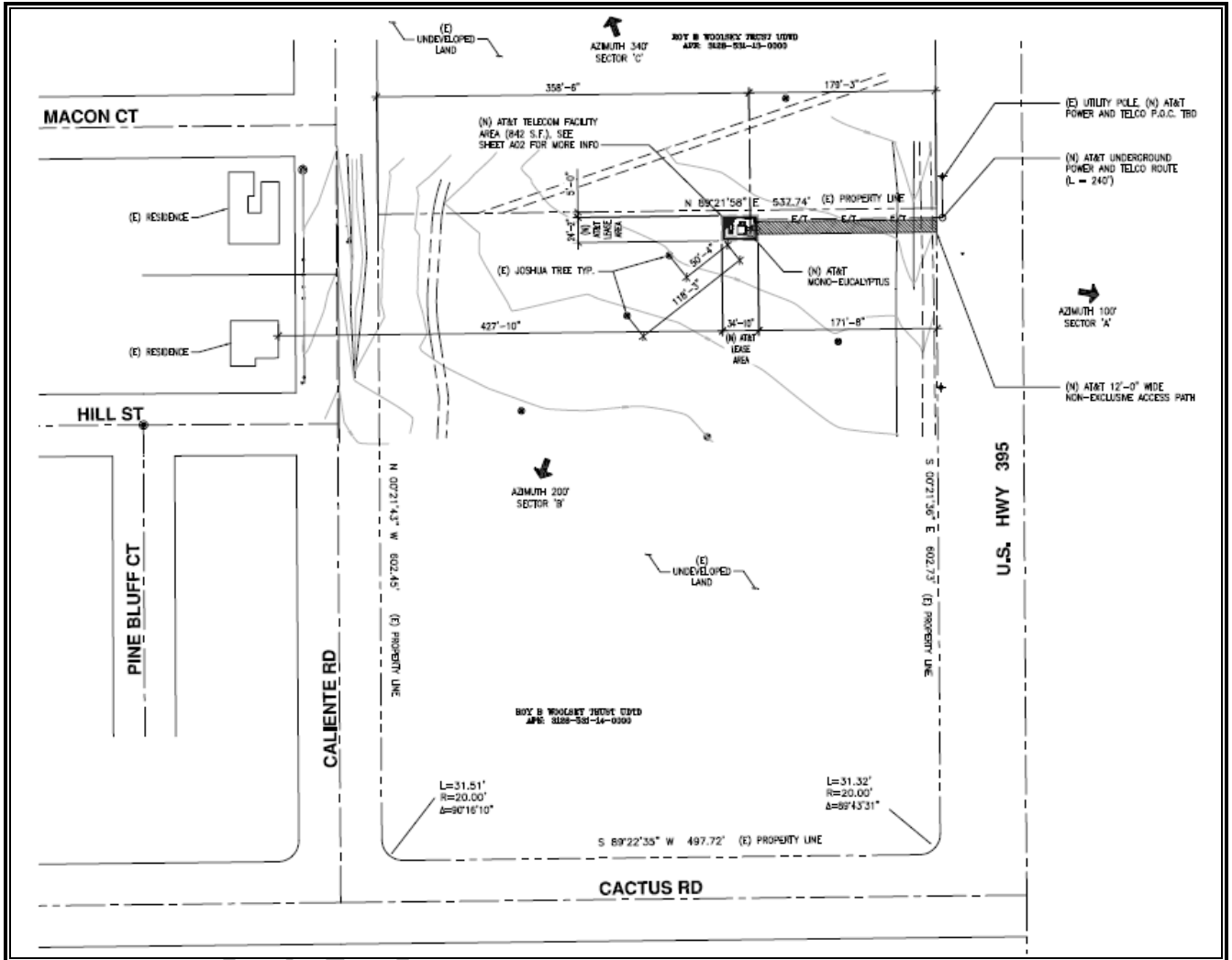


Source: Google Maps

Local Area Map

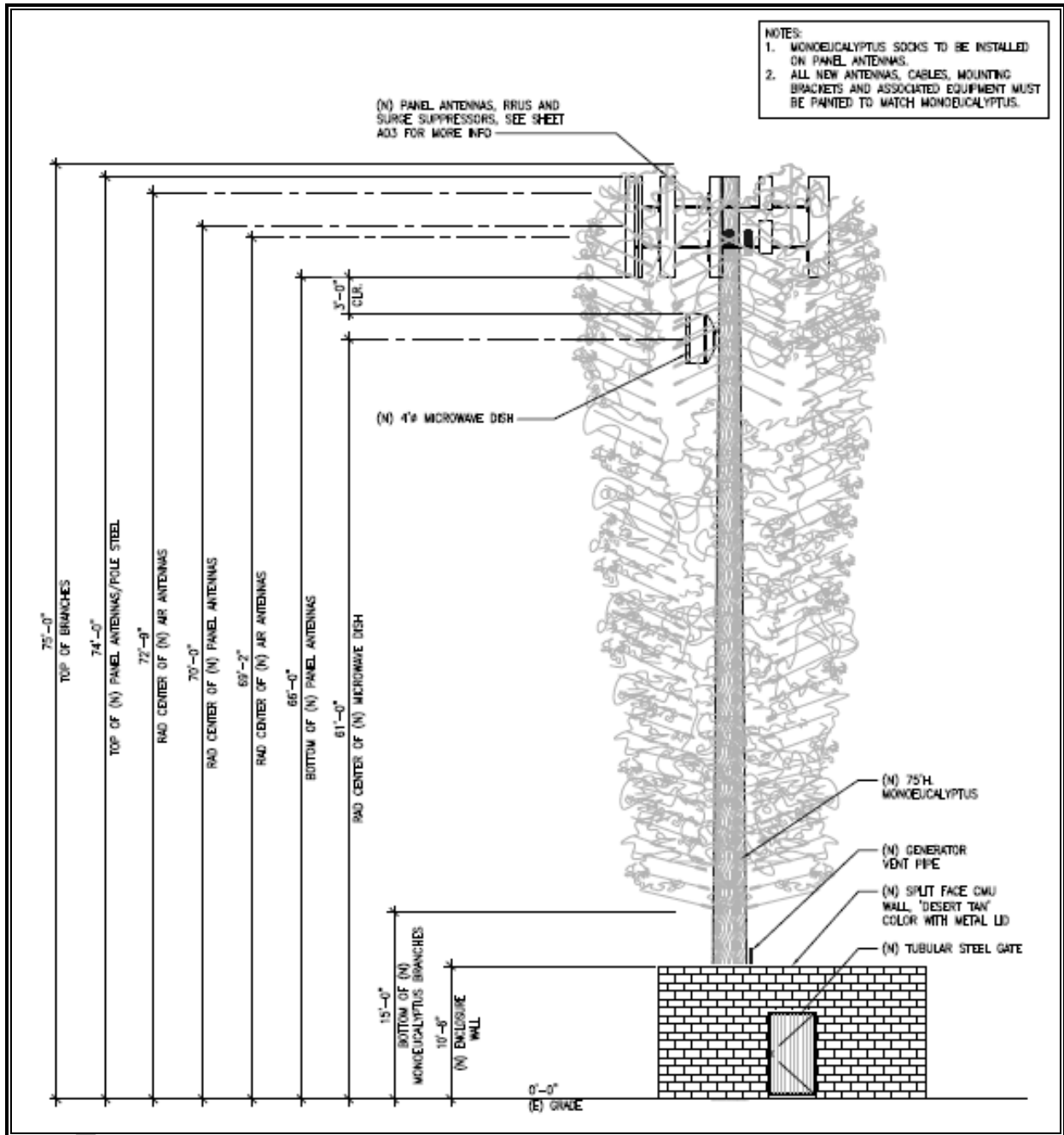


Public Review



Source: DCI Pacific

Site Plan



Source: DCI Pacific

Site Plan, Elevations



View north toward project lease area.



View south toward proposed project lease area.



View west toward proposed project lease area.



View east toward proposed project lease area and proposed access and utility trench route.



View east along proposed access and utility trench route, toward HWY 395.



View north from proposed access and utility trench route.



View south from proposed access and utility trench route.



View west from access and utility trench route at HWY 395.



View south from access and utility trench route at HWY 395.



View north from access and utility trench route at HWY 395.



View north at existing utility pole on HWY 395 for AT&T proposed POC.



Existing utility pole on HWY 395 for AT&T proposed POC.



View west at existing underground petroleum pipeline easement north of AT&T access.



View west toward Joshua tree approximately 50' southwest of lease area as shown on drawings.



View north along Caliente Road, west of subject property.



View east at the southwest corner of Caliente Road and Cactus Road.



View southwest at adjacent commercial uses southwest of subject property.



View northeast at commercial use, southeast corner of HWY 395 and Cactus Road.

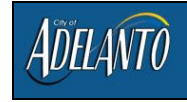
3.0 Environmental Impact Analysis

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. At least two (2) Joshua Trees appear to be located west of the site, approximately 50 feet southwest and 118 feet southwest respectively. Based on review of the drawings provided, the Joshua trees do not appear to be impacted as a result of this project.



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 will be required to comply with these aesthetic code requirements. From a visual standpoint, the closest residential uses are approximately 427 feet west of the proposed facility.

- 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 427 feet east 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 will be required to comply with these code requirements. From a visual standpoint, the closest residential uses are approximately 427 feet west of the proposed facility. 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 will be required to be consistent with the City's Municipal Code for Antennas and Cellular Telephone Towers 17.80.020(e)(3&4)A.5, -B and -C. From a visual standpoint, the closest residential uses are approximately 427 feet west of the proposed facility. 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 427 feet east of residential uses. The stealth facility will be required to be consistent with the City's Municipal Code for Antennas and Cellular Telephone



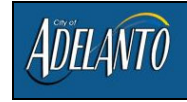
Towers 17.80.020 (e) (3&4) A.5, -B and -C. Therefore, less than significant impacts on public views are anticipated.

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.

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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).

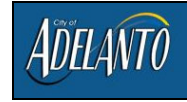
Climate

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.

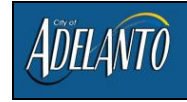
Conclusions

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)?**

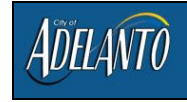
Less Than Significant Impacts. Section 17.90.110 (Odors) of the Adelanto Municipal Code states: "No operation or activity shall be permitted to emit odorous gases or other odorous matter in such quantities as to be dangerous, injurious, noxious, or otherwise objectionable and readily detectable without 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 Assessment		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 Assessment		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 Assessment			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 Assessment			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Biological Assessment			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 Assessment				X

Biological Resource

Based on the Focused Survey, Habitat Assessments and General Biological Resource Assessment prepared for this project by Circle Mountain Biological Consultants, Inc. (CMBC) and attached to this Initial Study and MND, the proposed Project will not significantly impact biological resources. The assessment included a focused survey for the Agassiz’s Desert Tortoise, habitat assessments for the Burrowing Owl and Mohave Ground Squirrel and general biological resources assessment. A summary of the assessment is included below.



Literature Review

The biological consultant utilized materials included in their library of documentation to determine the nearest tortoise locations and other special status plant and animal species that have been reported from the vicinity of the subject property. Of relevance, given their proximity to the subject property, are 12 focused tortoise surveys completed on 12 sites, located between approximately 60 feet south (CMBC 2008c) and 5 miles north of the parcel (TMC 1992b), between 1990 (TMC 1990a) and 2009 (CMBC 2009).

With the publication of the Bureau of Land Management's (BLM) Record of Decision (BLM 2016), the Desert Renewable Energy Conservation Plan (DRECP) revised the 1980 California Desert Conservation Area Plan (CDCA Plan; BLM 1980) in significant ways for the conservation and recovery of desert tortoises in the California Deserts. Although desert tortoise critical habitat was not changed (USFWS 1994a), Desert Wildlife Management Areas (DWMAs; USFWS 1994b) and Multiple Use Classes on BLM lands were eliminated. In addition to critical habitat, the two main designated areas under the DRECP CDCA Plan amendment that provide for tortoise conservation and recovery are Areas of Critical Environmental Concern (ACECs) and California Desert National Conservation Lands (CDNCLs). The subject property is not found within any of these conservation areas. The site is not found within Agassiz's desert tortoise critical habitat, which was designated in 1994 (U.S. Fish and Wildlife Service 1994a).

Field Survey and Habitat Assessment Methodology

For a total of 7.5 survey hours, between 0800 and 1145 on 17 November 2022, Sharon Dougherty and Sarah Teed of CMBC surveyed the site and adjacent areas as described in the biological assessment. This entailed a survey of 50 transects, spaced at 10-meter (30-foot) intervals and oriented along an east-west axis throughout the 14.9-acre site. Five zone of influence transects were surveyed for detection of burrowing owls at 30-meter (100-foot) intervals on undeveloped property to the north.

As the site was surveyed, Dougherty kept tallies of observable human disturbances encountered on the 25 transects she surveyed. The results of this method provide encounter rates for observable human disturbances. The temperature was 47°F, winds ranged from 1-2 miles per hour from the southwest, and skies were clear.

All plant and animal species identified during the survey were recorded in field notes. Garmin hand-held, global positioning system (GPS) units were used to survey straight-line transects and record Universal Transverse Mercator (UTM) coordinates (North American Datum – NAD 83) for property boundaries, rare species locations, and other pertinent information. A cell phone was used to take representative digital photographs. Google Earth 2022 was accessed via the internet to provide available aerial photographs of the subject property and surrounding areas.

The 21 plant species were identified during the survey. The plant community present on the site is best described as degraded *Larrea tridentata* – *Ambrosia dumosa* shrubland alliance, based on the system devised by Sawyer, Keeler-Wolf, and Evens (2008) in collaboration with the

California Native Plant Society (CNPS) and CDFW. Dominant perennials include creosote bush (*Larrea tridentata*), burrobush (*Ambrosia dumosa*), and Nevada joint-fir (*Ephedra nevadensis*). Joshua trees (*Yucca brevifolia*) are scattered throughout the site. Few annual plant species were observed, likely due to the timing of the survey in late fall/early winter. These were mostly disturbance tolerant species, such as annual bur-sage (*Ambrosia acanthicarpa*), or non-native, invasive species, such as split-grass (*Schismus* sp.), puncture vine (*Tribulus terrestris*), and Saharan mustard (*Brassica tournefortii*).

Six bird and four mammal species were identified during the survey. The birds observed are common Mojave desert species, often found in suburban areas, and include common raven (*Corvus corax*), house finch (*Carpodacus mexicanus*), horned lark (*Eremophila alpestris*), rock dove or pigeon (*Columbia livia*), and American kestrel (*Falco sparverius*), as well as burrowing owl. Mammals detected by burrows or other sign included California ground squirrel (*Otospermophilus beecheyi*), kangaroo rat (*Dipodomys* sp.), and kit fox (*Vulpes macrotis*). An abandoned kit fox den was found on the subject property. However, no recent sign of the species was found on-site, and kit fox appears to be absent at the present time.

No reptiles were observed, likely due to cold temperatures. Locally common reptile species that may occur include side-blotched lizard (*Uta stansburiana*), zebra-tailed lizard (*Callisaurus draconoides*), long-nosed leopard lizard (*Gambelia wislizenii*), desert horned lizard (*Phrynosoma platyrhinos*), desert night lizard (*Xantusia vigilis*), red racer (*Masticophis flagellum*), glossy snake (*Arizona elegans*), gopher snake (*Pituophis melanoleucus*), long-nosed snake (*Rhinocheilus lecontei*), and various rattlesnake species (*Crotalus* ssp.).

Based on the biological assessment, no blueline streams designated by the USGS occur on-site.

Summary of Results and Recommendations

Agassiz's desert tortoise. No tortoise sign was found either onsite or in adjacent areas during this focused, protocol survey for the species (USFWS 2019). Based on the absence of tortoise sign on the subject property, in adjacent areas, and reported from the region, CMBC concludes that Agassiz's desert tortoise is absent from the subject property and action area. Also, there is no likelihood of wild tortoises entering the site from adjacent areas, either to pass through the site or establish residency. Based on the absence of tortoise sign onsite and in adjacent areas, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the subject property. As such, no impacts are anticipated, and no mitigation measures are recommended.

However, if a tortoise is found onsite at the time of construction, all activities likely to affect that animal(s) should cease and the County contacted to determine appropriate steps. Importantly, nothing given in this report, including recommended mitigation measures, is intended to authorize the incidental take of Agassiz's desert tortoises during site development. Such authorization must come from the appropriate regulatory agencies, including CDFW (i.e.,



authorization under section 2081 of the Fish and Game Code) and USFWS [i.e., authorization under section 10(a)(1)(B) of the Federal Endangered Species Act].

Burrowing Owl. Since burrowing owls and signs were found, it will be necessary to perform breeding burrowing owl surveys during the spring and summer as outlined in CDFG (2012) prior to any ground disturbance. If impacts cannot be avoided, specified mitigation measures include:

- (a) avoiding occupied burrows during the breeding season, between February 1 and August 31;
- (b) purchasing and permanently protecting 6.5 acres of foraging habitat per pair or unpaired resident bird impacted;
- (c) creating new burrows or enhancing others when destruction of occupied burrows is unavoidable;
- (d) implementing passive relocation if owls must be moved; and
- (e) provide funding for long-term management and monitoring of protected lands.

Given this information, CMBC reiterates that it is highly advisable (and cost effective) to avoid impacts. CDFG (2012) states the following. If avoidance is the preferred method of dealing with potential project impacts, then the following would apply:

- No Disturbance within 50 meters (approximately 160 feet), which may result in harassment of owls at occupied burrows;
- No Destruction of natural or artificial burrows (i.e., culverts, concrete slabs, and debris piles that provide shelter to burrowing owls); and
- No Destruction and/or degradation of foraging habitat adjacent [within 100 meters (approximately 320 feet)] of an occupied burrow(s).

Western Joshua tree. CDFW has recently recommended the following analysis for impacts to Western Joshua trees (WJT) and specific permitting and mitigation for another recent project in Adelanto, and are likely to have similar requirements for this project.

- 1) assessing potential impacts to WJTs within a 186-foot buffer zone for each WJT (Vander Wall et al. 2006),
- 2) implementation of a 300-foot buffer around each WJT not scheduled for removal,
- 3) a mitigation strategy addressing impacts to Joshua tree individuals, the WJT seedbank, and indirect impacts to WJT.

Western Joshua Tree Take: If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an incidental take permit (ITP) from California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), prior to the relocation, removal, or take (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of western Joshua tree,

a Candidate for Threatened CESA-listed species. Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.” (CDFW to City of Adelanto Planning, 7 November 2022). CMBC recommends that all Joshua trees be avoided to the extent possible. If it is necessary to remove and/or salvage a tree, the California Department of Fish and Wildlife should be contacted to obtain the necessary permissions and procedures.

Mohave ground squirrel. Although a focused Mohave ground squirrel trapping survey was not performed, CMBC assessed habitats and reviewed available information to provide a professional opinion as to the presence or absence of this species on the subject property. CMBC concludes that habitat loss and degradation onsite and isolation of the site from the east, west, and south have significantly diminished the likelihood of occurrence, and judges that Mohave ground squirrel is absent from the site and that protocol trapping surveys are not warranted.

Nesting birds. If it is necessary to commence project construction between March 15 and September 15, a qualified biologist should survey all shrubs and structures within the project site for nesting birds, prior to project activities (including construction and/or site preparation).

Surveys should be conducted at the appropriate time of day during the breeding season, and surveys would end no more than three days prior to clearing. CDFW is typically notified in writing prior to the start of the surveys. Documentation of surveys and findings should be submitted to the CDFW within ten days of the last survey. If no nesting birds were observed, project activities may begin. If an active bird nest is located, the plant in which it occurs should be left in place until the birds leave the nest. No construction is allowed near active bird nests of threatened or endangered species.

Other Special Status Species. Based on the field survey and habitat assessment, CMBC concludes that none of the following special status species reported from the region will be adversely affected by site development: Northern harrier, LeConte’s thrasher, loggerhead shrike. As such, no adverse impacts have been identified and no mitigation measures are recommended.

Prairie falcons, sharp-shinned hawks, and Cooper’s hawks could experience a small (± 3 acres), incremental loss of foraging habitat.



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 Focused Survey, Habitat Assessments and General Biological Resource Assessment 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. Based on the results of the Focused Survey, Habitat Assessments and General Biological Resource Assessment conducted for the Initial Study/MND, 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

Agassiz's desert tortoise. *Based on the absence of tortoise sign onsite and in adjacent areas, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the subject property. As such, no impacts are anticipated, and no mitigation measures are recommended.*

However, if a tortoise is found onsite at the time of construction, all activities likely to affect that animal(s) should cease and the County contacted to determine appropriate steps. Importantly, nothing given in this report, including recommended mitigation measures, is intended to authorize the incidental take of Agassiz's desert tortoises during site development. Such authorization must come from the appropriate regulatory agencies, including CDFW (i.e., authorization under section 2081 of the Fish and Game Code) and USFWS [i.e., authorization under section 10(a)(1)(B) of the Federal Endangered Species Act].

Burrowing Owl. *Since burrowing owls and signs were found, it will be necessary to perform breeding burrowing owl surveys during the spring and summer as outlined in CDFG (2012) prior to any ground disturbance. If impacts cannot be avoided, specified mitigation measures include:*

- (a) avoiding occupied burrows during the breeding season, between February 1 and August 31;*
- (b) purchasing and permanently protecting 6.5 acres of foraging habitat per pair or unpaired resident bird impacted;*
- (c) creating new burrows or enhancing others when destruction of occupied burrows is unavoidable;*
- (d) implementing passive relocation if owls must be moved; and*
- (e) provide funding for long-term management and monitoring of protected lands.*

Given this information, CMBC reiterates that it is highly advisable (and cost effective) to avoid impacts. CDFG (2012) states the following. If avoidance is the preferred method of dealing with potential project impacts, then the following would apply:

- No Disturbance within 50 meters (approximately 160 feet), which may result in harassment of owls at occupied burrows;*
- No Destruction of natural or artificial burrows (i.e., culverts, concrete slabs, and debris piles that provide shelter to burrowing owls); and*
- No Destruction and/or degradation of foraging habitat adjacent [within 100 meters (approximately 320 feet)] of an occupied burrow(s).*

Western Joshua tree. *CDFW has recently recommended the following analysis for impacts to Western Joshua trees (WJT) and specific permitting and mitigation for another project in Adelanto, and are likely to have similar requirements for this project.*

- 1) assessing potential impacts to WJTs within a 186-foot buffer zone for each WJT (Vander Wall et al. 2006),*
- 2) implementation of a 300-foot buffer around each WJT not scheduled for removal,*
- 3) a mitigation strategy addressing impacts to Joshua tree individuals, the WJT seedbank, and indirect impacts to WJT.*

Western Joshua Tree Take: If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an incidental take permit (ITP) from California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), prior to the relocation, removal, or take (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of western Joshua tree, a Candidate for

Threatened CESA-listed species. Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.” (CDFW to City of Adelanto Planning, 7 November 2022). CMBC recommends that all Joshua trees be avoided to the extent possible. If it is necessary to remove and/or salvage a tree, the California Department of Fish and Wildlife should be contacted to obtain the necessary permissions and procedures.

Nesting birds. *If it is necessary to commence project construction between March 15 and September 15, a qualified biologist should survey all shrubs and structures within the project site for nesting birds, prior to project activities (including construction and/or site preparation).*

Surveys should be conducted at the appropriate time of day during the breeding season, and surveys would end no more than three days prior to clearing. CDFW is typically notified in writing prior to the start of the surveys. Documentation of surveys and findings should be submitted to the CDFW within ten days of the last survey. If no nesting birds were observed, project activities may begin. If an active bird nest is located, the plant in which it occurs should be left in place until the birds leave the nest. No construction is allowed near active bird nests of threatened or endangered species. 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

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 Focused Survey, Habitat Assessments and General Biological Resource Assessment prepared for this project by Circle Mountain Biological Consultants, Inc. (CMBC) and attached to this Initial Study and MND, 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 Impact. Based on the biological assessment, no blueline streams designated by the USGS occur on-site. Therefore, 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.

- 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. With the publication of the Bureau of Land Management's (BLM) Record of Decision (BLM 2016), the Desert Renewable Energy Conservation Plan (DRECP) revised the 1980 California Desert Conservation Area Plan (CDCA Plan; BLM 1980) in significant ways for the conservation and recovery of desert tortoises in the California Deserts. Although desert tortoise critical habitat was not changed (USFWS 1994a), Desert Wildlife Management Areas (DWMAs; USFWS 1994b) and Multiple Use Classes on BLM lands were eliminated. In addition to critical habitat, the two main designated areas under the DRECP CDCA Plan amendment that provide for tortoise conservation and recovery are Areas of Critical Environmental Concern (ACECs) and California Desert National Conservation Lands (CDNCLs). The subject property is not found within any of these conservation areas. The site is not found within Agassiz's desert tortoise critical habitat, which was designated in 1994 (U.S. Fish and Wildlife Service 1994a).

The Project site is relatively small and located adjacent to existing single-family residential development to the west 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.

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 assessment 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 Assessment prepared by Duke Cultural Resources Management, LLC for the Initial Study and attached to this MND, the proposed Project will not significantly impact cultural resources with mitigation incorporated. The cultural assessment has been summarized below.

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.)

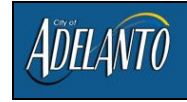
Warren and Crabtree employ a more ecological approach to the deserts of southern California, defining five periods in prehistory (1986):

- I. Lake Mojave Complex (c. 12,000-7,000 B.C.)
- II. Pinto Complex (7,000-4,000 B.C.)
- III. Gypsum Complex (c. 4,000-1,500 B.C.)
- IV. Saratoga Springs Complex (c. 1500-800 B.C.)
- V. Shoshonean (c. 800-200 B.P.)

Cultural Record Search and Results

DUKE CRM conducted a records search for cultural resources (archaeological and historical) at the South-Central Coastal Information Center (SCCIC), located at California State University, Fullerton. This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources surveys and excavation reports generated from projects located within ½ mile of the proposed Project. In addition, a review was conducted of the Built Environment Resources Directory (BERD), which includes the National Register of Historic Places (NRHP), California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest.

The records search was conducted on November 15, 2022. The SCCIC identified three (3) historic resources within ½ mile of the Project (see Table below). Of these resources, the Southern California Edison (SCE) Bishop Creek to San Bernardino Tower Line is the closest, located approximately 530 ft. east of the Project. The Tower Line was constructed from 1911-1913 and is listed in the NR as eligible (2S2) in 2021. Additionally, the SCCIC identified eleven (11) cultural resource studies within ½ mile of the Project. Of these reports, none covered the Project area.



Cultural Resources within 1/2 mile of Project

Resource No.	Resource Type	Description	NRHP Eligible	Distance (ft.) and Direction
P-36-004018	Historic	Refuse Deposit	Unknown	645 east
P-36-004203	Historic Built Environment	SCE Bishop Creek to San Bernardino Tower Line	2S2	530 east
P-36-023318	Historic	One solder-dot metal can	Unknow	810 north

2S2: Individually determined eligible for NR by consensus through Section 106 process. Listed in the CR.

A review of the San Bernardino County BERD indicates that the property located at the northwest corner of Cactus Road and Highway 395 has not been previously evaluated for the NRHP. The BERD was accessed on December 6, 2022.

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.

Field Survey and Results

The current field survey did not identify any cultural resources within the direct APE. The ground in the area consists of exposed sediment and small scattered bushes. Ground surface visibility is excellent, ranging from 80 to 100 percent, with exposed sediment consisting of a light brown silty loam. The surrounding area is predominantly commercial properties, residential properties, Highway 395, and undeveloped land. The surrounding setting is a mix of natural habitat and modern residential tracts; it does not appear to be historic.

Impact Assessment

The records search and field survey identified three cultural resources within the indirect APE for the Project. The nearest cultural resource (P-36-004203) is the SCE Bishop Creek to San Bernardino Tower Line, located 530 ft. east of the Project. The proposed ground disturbance will be approximately 240 ft. of trenching to the east. Therefore, there is limited to no potential for direct or indirect impacts to the Tower Line or the other two historic resources recorded nearby. The Project will not have any direct or indirect impacts to any historic properties. This leads to a finding of no historic properties affected for the facility. No recommendations are made for further cultural resource efforts. If the Project description changes additional studies may be warranted.

In the event that remnants from an archaeological site are discovered during ground disturbing activities, all work shall halt temporarily until a qualified archaeologist can be retained by the



Project proponent to assess the significance of the find. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of the origin and disposition of the remains pursuant to State Public Resources Code Section 5097.98. The County Coroner must be notified immediately.

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 “archaeological resources” is contained in Section 15064.5 of the CEQA Guidelines. Based on the site visit conducted and analysis of the records reviewed, the proposal project will not impact the archaeological resources. Therefore, based on the cultural resource report prepared for this Initial Study and MND, 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, 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?

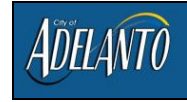
No Impact. There are no prominent hills within the Project vicinity that could subject the Project site to hazards associated with landslides. Thus, the potential for landslides is considered negligible. As such, the Project would not directly or indirectly cause potential substantial adverse effects, 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.

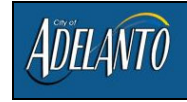
e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

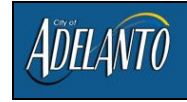
Regulatory Setting

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.

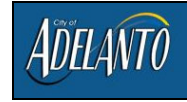


Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.9 HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine 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 High Desert Truck Stop located southeast of the project, southeast corner of Highway 395 and Cactus Road is listed as a permitted Underground Storage Tank site. No violations were listed.

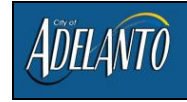
Additional areas with Recognized Environmental Concerns are reported along the Highway 15 corridor, which is greater than 2 miles east of the Project site and the Southern California logistics airport approximately 3 miles north-northeast of the site. These sites are not likely to present an environmental 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. The closest residential use is located approximately 427 feet west of the proposed facility. 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. The closest residential use is located approximately 427 feet west of the proposed facility. 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 Victoria Magathan Elementary School, located approximately 1 mile northwest of the Project along Holly Road, and Donald F. Bradach Elementary School, located approximately 1 mile southwest of the project along Lupin Road. The next closest schools appear to be the Gus Franklin Jr. Elementary School and the Melva Davis Academy of Excellence, both located approximately 1.5 miles east of the Project. Highway 395, Caliente and Cactus Roads will remain open at all times during construction. Due to these school locations, less than significant impacts are anticipated. The closest residential use is located approximately 427 feet west of the proposed facility.

- 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 3 miles north-northeast of the project site. No impacts are anticipated.

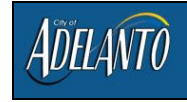
- f) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

No Impact. Based on the project information, the project will not impair long-term implementation or physically interfere with an adopted emergency response plan. Caliente and Cactus Roads, and Highway 395 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	
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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/MND, 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”. However, to the east of Highway 395 is the City of Victorville jurisdiction. This area of the FEMA map is reported as Zone X, area of minimal flood hazard.

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.

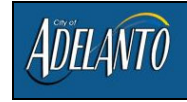
ii) substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impacts. Based on the type of project, minor impervious surfaces will be created with the equipment foundation. Storm drainage off the site is currently directed to the northeast. 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 northeast. 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, tsunamis, 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 northeast. 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 northeast. 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 427 feet west 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. The City will require a Conditional Use Permit (CUP) and Land Development Permit (LDP) for this project.

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.

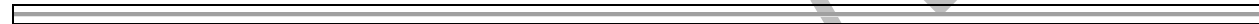


a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

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?**

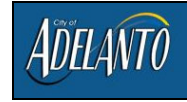
No Impact. There are no land use plans that identify the Project site or surrounding areas as a locally-important mineral resource recovery site. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, 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 427 feet west 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 in this area of the project. 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

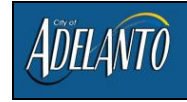
The proposed project is anticipated to have short-term noise impacts during construction (6 to 8 weeks), although construction will not be continuous during this time period. No work is proposed at night. Short-term noise levels will not be in excess of standards established in the City General Plan 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 427 feet west 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 3 miles north-northeast 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)?**

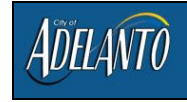
No Impact. The project will not induce substantial unplanned population growth. The project is an unmanned wireless telecommunication facility. The proposed project is anticipated to have no growth impacts.

- 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. Highway 395, Caliente and Cactus Roads 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. Highway 395, Caliente and Cactus Roads 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 Victoria Magathan Elementary School, located approximately 1 mile northwest of the Project along Holly Road, and Donald F. Bradach Elementary School, located approximately 1 mile southwest of the project along Lupin Road. The next closest schools appear to be the Gus Franklin Jr. Elementary School and the Melva Davis Academy of Excellence, both located approximately 1.5 miles east of the Project. Highway 395, Caliente and Cactus Roads 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	

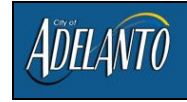
Transportation

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 proposed AT&T mono-eucalyptus and equipment will be located approximately 427 feet east from the closest residential area along Caliente Road, approximately 171 feet west of Highway 395, and approximately 600 feet north of Cactus Road, in the City of Adelanto, San Bernardino County, California (Project Site). U.S. Highway 395 is a north-south trending highway in this area and intersects with east-west trending Cactus Road to the south. Interstate 15 is located further to the east.

Caliente Road is a paved two-laned local street trending north-south in this area, with curb, gutter, sidewalk and overhead street lighting only on the west side of the road. Caliente Road is improved with storm drains, water and sewer facilities to service the residential area. Cactus Road is a paved two-laned local road with center turns lanes trending in an east-west direction. The portion of Cactus Road west of Caliente Road is improved with curbs, gutters, sidewalks,



overhead street lighting, water, sewer and storm drain facilities. Cactus Road east of Caliente Road is still a two laned road but with no curbs, gutters or sidewalks. Highway 395 borders the eastern portion of the parent property and trends in a north-south direction. Highway 395 is a paved 4-laned major highway with center turn lanes, right-turn lanes, bikeways, overhead street lighting, underground utilities, signage and parking in some area.

Conclusions

During construction, short-term parking is anticipated along the right-of-way of Highway 395. 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 parking is anticipated along the right-of-way of Highway 395. Impacts are considered less than significant levels through traffic control measures, construction timing and construction phasing to avoid peak hour drive times. 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 is anticipated along the right-of-way of Highway 395. Highway 395 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’ Kaits (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 December 5, 2022. While the absence of specific site information in the sacred lands file does not indicate the absence of cultural resources, a list of seven (7) different Native American organizations was provided for consultation. Tribal consultation correspondence is attached this MND. The following parties have responded:

- Quechan Historic Preservation, Jill McCormick, Historic Preservation Officer responded via email on December 12, 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.”

- Bonnie Bryant, Cultural Resources Technician with the San Manuel Band of Mission Indians replied via email on December 8, 2022, and again on December 28, 2022. Recommendations have been included as mitigation below.
- No other NAHC Native Americans and/or Tribes have responded as of the date of this Initial Study and MND.

The FCC Tower Construction Notification System (TCNS) was contacted due to the FCC licenses that AT&T holds. The TCNS automated system replied on December 27, 2022. Eight (8) 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 expressed a specific concern with the proposed site. The TCNS process was complete as of February 17, 2023.

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

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.

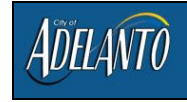


Issues and Supporting Information	Sources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.19 UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Require or result in the relocation or construction of new or expanded water, 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. Highway 395 and Caliente and Cactus Roads 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.



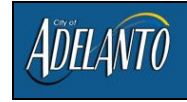
- c) **Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

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, CSL00199, Site Name: Woosley

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: James C. Hirsch 760-246-2300, ext. 11190

Project Location: The undeveloped property is currently owned by the Woolsey Roy B. Trust and is identified by Assessor Parcel Number (APN) 3128-531-14-0000 with a total area of approximately 15 acres (henceforth called “Parent Property”). The proposed AT&T mono-eucalyptus and equipment will be located approximately 427 feet east from the closest residential area along Caliente Road, approximately 171 feet west of Highway 395, and approximately 600 feet north of Cactus Road, in the City of Adelanto, San Bernardino County, California (Project Site). U.S. Highway 395 is a north-south trending highway in this area and intersects with east-west trending Cactus Road to the south. Interstate 15 is located further to the east. The Project Site will be located along the north-eastern boundary of the parent property (latitude: N34.537584 degrees, longitude: W-117.400317 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 the NE ¼ of Section 9 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 3,005 feet above mean sea level. The property has a Zoning designation of Commercial and is currently vacant.

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-four foot, two inch (24'-2") by thirty-four foot, ten inch (34'-10") lease area (842 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 one hundred seventy-one feet (171') non-exclusive vehicular path which will have a gravel base. The access will enter from Highway 395 to the east. Approximately two hundred forty feet (240') of electrical and telco trenching will be required from the proposed site eastward toward Highway 395, then northerly along the Highway 395 right of way, to an existing utility pole for AT&T's point of connection (POC). The trenching will follow the proposed access path.

Construction

Construction access is also proposed from the Highway 395 right of way. A short-term impact of this project will likely be the inconveniences created for short periods of time on traffic flows along Highway 395. 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 the Highway 395 right of way. Semi-trucks carrying the mono-eucalyptus and equipment will enter and exit from Highway 395 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 west of the project site will not be impacted.

Surrounding Land Uses and Setting:

The 15-acre parent property is primarily undeveloped level land. 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 northeast. At least two (2) Joshua Trees appear to be located west of the site, approximately 50 feet southwest and 118 feet southwest respectively. Based on review of the drawings provided, the Joshua trees do not appear to be impacted as a result of this project.

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 to the north is undeveloped and vacant land with natural vegetation. The next closest improved road is Holly Road approximately 4,000 lineal feet to the north.

South: The property to the south is undeveloped and vacant land with natural vegetation. Cactus Road is located approximately 600 south and is developed as a two laned

paved road with center turn-lane and curb and gutters west of Caliente Road. East of Caliente Road, Cactus Road is paved but has no curbs, gutters or street lights. Southwest of Caliente and Cactus Roads is a small commercial center with paved parking, landscaping and lighting.

East: Property to the east consists of vacant, undeveloped land with natural vegetation. Highway 395 is located approximately 171 feet east and will provide access to the proposed lease area. The east side of Highway 395 is located in the City of Victorville. Further southeast is a commercial service station.

West: The property to the west is undeveloped and vacant land with natural vegetation. Further west of the proposed project is Caliente Road. Single family residential uses are located west of Caliente Road. The closest residence is approximately 427 feet west from the project.

Caliente Road is a paved two-laned local street trending north-south in this area, with curb, gutter, sidewalk and overhead street lighting only on the west side of the road. Caliente Road is improved with storm drains, water and sewer facilities to service the residential area. Cactus Road is a paved two-laned local road with center turns lanes trending in an east-west direction. The portion of Cactus Road west of Caliente Road is improved with curbs, gutters, sidewalks, overhead street lighting, water, sewer and storm drain facilities. Cactus Road east of Caliente Road is still a two laned road but with no curbs, gutters or sidewalks. Highway 395 borders the eastern portion of the parent property and trends in a north-south direction. Highway 395 is a paved 4-laned major highway with center turn lanes, right-turn lanes, bikeways, overhead street lighting, underground utilities, signage and parking in some area.

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 Highway 395.
- 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

February 10, 2023

Date

James C. Hirsch (electronic)

Signature: City of Adelanto Planning Division

February 22, 2023

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)	<p><i>Mitigation</i> Agassiz's desert tortoise. Based on the absence of tortoise sign onsite and in adjacent areas, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the subject property. As such, no impacts are anticipated, and no mitigation measures are recommended.</p> <p><i>However, if a tortoise is found onsite at the time of construction, all activities likely to affect that animal(s) should cease and the County contacted to determine appropriate steps. Importantly, nothing given in this report, including recommended mitigation measures, is intended to authorize the incidental take of Agassiz's desert tortoises during site development. Such authorization must come from the appropriate regulatory agencies, including CDFW (i.e., authorization under section 2081 of the Fish and Game Code) and USFWS [i.e., authorization under section 10(a)(1)(B) of the Federal Endangered Species Act].</i></p>	Pre- During- and Post- Construction	City of Adelanto

3.4a & b)	<p><i>Mitigation</i></p> <p>Burrowing Owl. Since burrowing owls and sign were found, it will be necessary to perform breeding burrowing owl surveys during the spring and summer as outlined in CDFG (2012) prior to any ground disturbance. If impacts cannot be avoided, specified mitigation measures include:</p> <p>(a) avoiding occupied burrows during the breeding season, between February 1 and August 31;</p> <p>(b) purchasing and permanently protecting 6.5 acres of foraging habitat per pair or unpaired resident bird impacted;</p> <p>(c) creating new burrows or enhancing others when destruction of occupied burrows is unavoidable;</p> <p>(d) implementing passive relocation if owls must be moved; and</p> <p>(e) provide funding for long-term management and monitoring of protected lands.</p> <p>Given this information, CMBC reiterates that it is highly advisable (and cost effective) to avoid impacts. CDFG (2012) states the following. If avoidance is the preferred method of dealing with potential project impacts, then the following would apply:</p> <ul style="list-style-type: none"> • No Disturbance within 50 meters (approximately 160 feet), which may result in harassment of owls at occupied burrows; • No Destruction of natural or artificial burrows (i.e., culverts, concrete slabs, and debris piles that provide shelter to burrowing owls); and • No Destruction and/or degradation of foraging habitat adjacent [within 100 meters (approximately 320 feet)] of an occupied burrow(s). 	Pre-Ground Disturbance	City of Adelanto
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<p>3.4a & b)</p>	<p><i>Mitigation</i> Western Joshua tree. CDFW has recently recommended the following analysis for impacts to Western Joshua trees (WJT) and specific permitting and mitigation for another project in Adelanto, and are likely to have similar requirements for this project.</p> <p>1) assessing potential impacts to WJTs within a 186-foot buffer zone for each WJT (Vander Wall et al. 2006), 2) implementation of a 300-foot buffer around each WJT not scheduled for removal, 3) a mitigation strategy addressing impacts to Joshua tree individuals, the WJT seedbank, and indirect impacts to WJT.</p> <p><i>Western Joshua Tree Take:</i> If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an incidental take permit (ITP) from California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), prior to the relocation, removal, or take (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of western Joshua tree, a Candidate for Threatened CESA-listed species. Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.” (CDFW to City of Adelanto Planning, 7 November 2022). CMBC recommends that all Joshua trees be avoided to the extent possible. If it is necessary to remove and/or salvage a tree, the California Department of Fish and Wildlife should be contacted to obtain the necessary permissions and procedures.</p>	<p>Pre- During- and Post- Construction</p>	<p>City of Adelanto</p>
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3.4a & b)	<p><i>Mitigation</i> Nesting birds. If it is necessary to commence project construction between March 15 and September 15, a qualified biologist should survey all shrubs and structures within the project site for nesting birds, prior to project activities (including construction and/or site preparation).</p> <p>Surveys should be conducted at the appropriate time of day during the breeding season, and surveys would end no more than three days prior to clearing. CDFW is typically notified in writing prior to the start of the surveys. Documentation of surveys and findings should be submitted to the CDFW within ten days of the last survey. If no nesting birds were observed, project activities may begin. If an active bird nest is located, the plant in which it occurs should be left in place until the birds leave the nest. No construction is allowed near active bird nests of threatened or endangered species.</p> <p>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.</p>	Pre-Construction	City of Adelanto
3.4a & b)	<p><i>Mitigation</i> General Construction work site measures:</p> <ul style="list-style-type: none"> • 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. 	Pre- During- and Post-Construction	City of Adelanto
3.4a & b)	<p><i>Mitigation</i> Best Management Practices: The adjacent drainage will need to be avoided and appropriate BMPs should be followed including, but not limited to:</p> <ul style="list-style-type: none"> • 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. 	Pre- During- and Post-Construction	City of Adelanto

3.10 c) i)	<i>Mitigation: The contractor will be required to implement Best Management Practices, as necessary.</i>	During Construction	City of Adelanto
3.5c) & 3.18 b)	<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>	During Construction	City of Adelanto

6.0 Source Documents

1.	City of Adelanto General Plan and Elements. (Not Attached)
2.	Focused Survey for Agassiz's Desert Tortoise, Habitat Assessments for Burrowing Owl and Mohave Ground Squirrel, and General Biological Resource Assessment, January 2023. (Attached)
3.	Cultural Resources Assessment, December 21, 2022. (Attached)
4.	Native American Consultation, December 5, 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, Adelanto, 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
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- ❑ Caltrans Preliminary Environmental Survey, Rancho Road Rehabilitation, City of Westminster, Orange County, 2014.

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- ❑ 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



AT&T MOBILITY

SITE NUMBER: CSL00199

SITE NAME: WOOLSEY

PACE: #MRLOS015323 | FA: #13014374 | USID: #281535

A/E DOCUMENT REVIEW STATUS

Table with columns for Status Code, Review Status, and Date. Includes codes 1 (Accepted), 2 (Not Accepted), and 4 (Review not required).

Main drawing content table with columns: DRAWING INDEX (ZONING), REV., DIRECTIONS, PROJECT INFORMATION, VICINITY MAP, CODE COMPLIANCE, and SITE QUALIFICATION PARTICIPANTS.

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DCI PACIFIC A/E/C WORKS

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

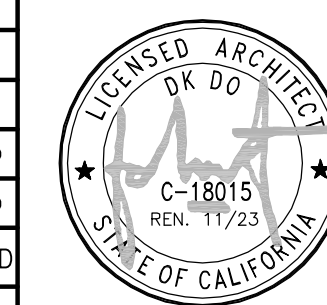
CSL00199 WOOLSEY PACE: #MRLOS015323 | FA: #13014374 | USID: #281535

NW OF CACTUS ROAD HWY 395 ADELANTO, CA 92301



1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780

Revision table with columns: NO., DATE, REVISIONS, BY, CHK, APP'D.

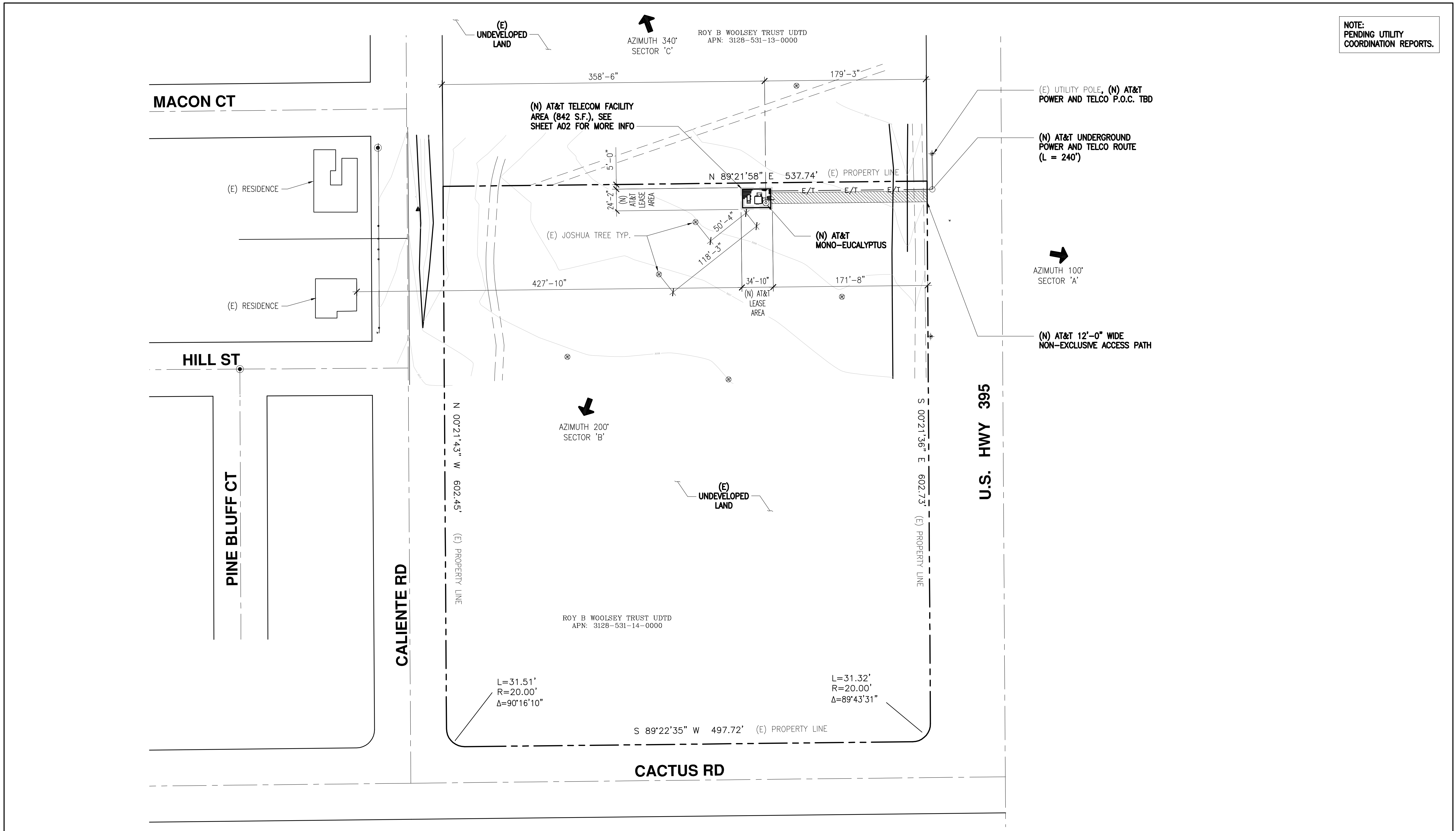


AT&T MOBILITY TUSTIN, CA

TITLE SHEET

Job and Drawing Information table with columns: JOB NO, DRAWING NUMBER, REV.

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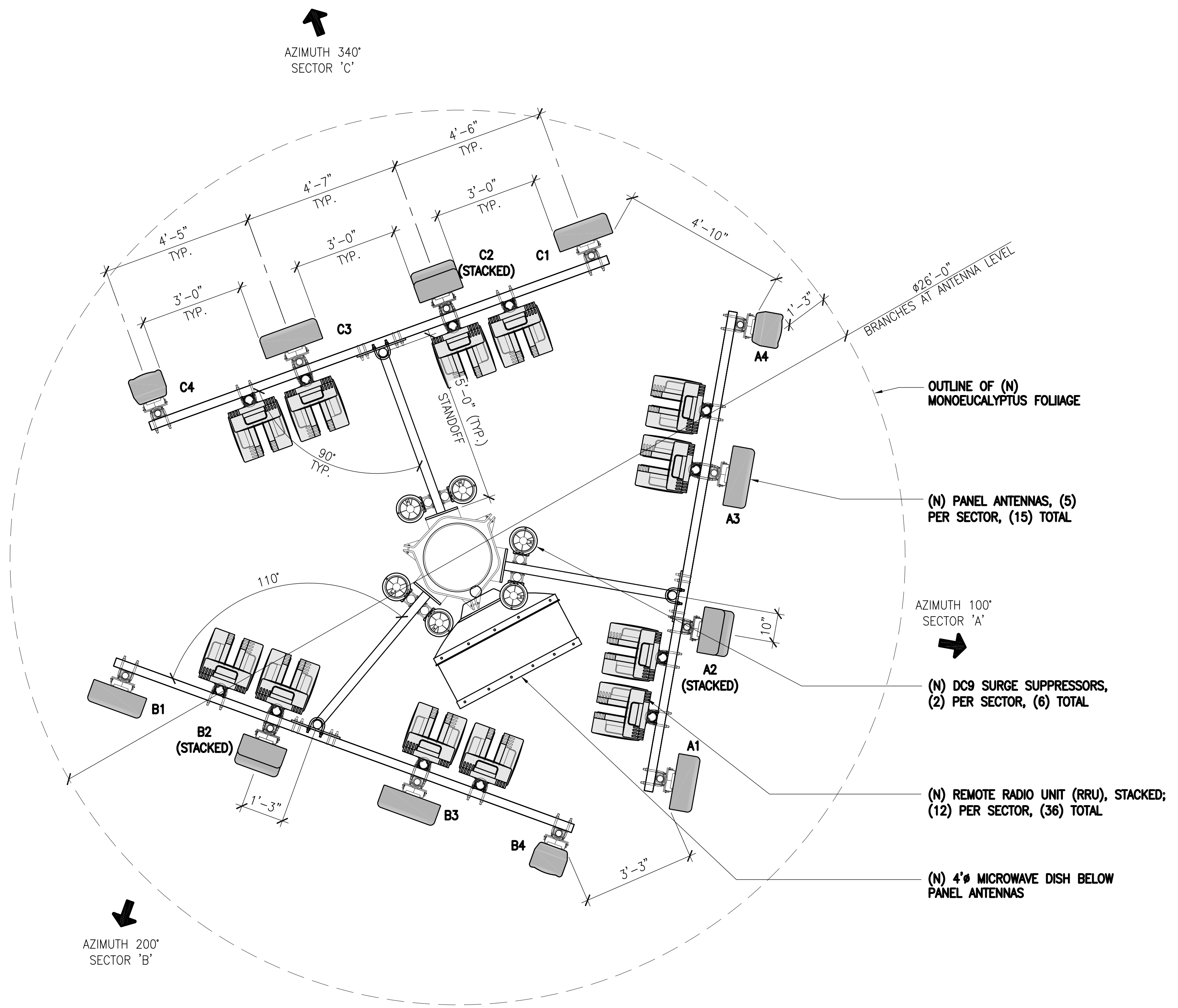
NOTE:
PENDING UTILITY
COORDINATION REPORTS.

SITE PLAN		SCALE: 1"=50'-0"	1																																		
DCI PACIFIC A E C WORKS <small>ARCHITECTURE ENGINEERING CONSULTING 26 EXECUTIVE PARK SUITE 170 IRVINE CA 92614</small>	CSL00199 WOOLSEY PACE: #MRLOS015323 FA: #13014374 USID: #281535 NW OF CACTUS ROAD HWY 395 ADELANTO, CA 92301	 <small>1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780</small>	<table border="1" style="width: 100%; border-collapse: collapse; font-size: x-small;"> <tr> <td style="width: 5%;">NO.</td> <td style="width: 15%;">DATE</td> <td style="width: 45%;">REVISIONS</td> <td style="width: 10%;">BY</td> <td style="width: 10%;">CHK</td> <td style="width: 15%;">APP'D</td> </tr> <tr> <td>0</td> <td>08/19/22</td> <td>ISSUED FOR ZONING PERMIT</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> <tr> <td>A</td> <td>07/25/22</td> <td>ISSUED FOR ZD REVIEW AND COMMENTS</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> <tr> <td colspan="6" style="text-align: center;">SCALE AS SHOWN DESIGNED DRAWN</td> </tr> </table> <div style="text-align: right; margin-top: 10px;"> </div> <table border="1" style="width: 100%; border-collapse: collapse; font-size: x-small;"> <tr> <td colspan="2" style="text-align: center;">AT&T MOBILITY TUSTIN, CA</td> </tr> <tr> <td colspan="2" style="text-align: center;">SITE 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-CSL00199-A01</td> </tr> <tr> <td></td> <td style="text-align: right;">REV. 0</td> </tr> </table>	NO.	DATE	REVISIONS	BY	CHK	APP'D	0	08/19/22	ISSUED FOR ZONING PERMIT	RF	BOK	DKD	A	07/25/22	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD	SCALE AS SHOWN DESIGNED DRAWN						AT&T MOBILITY TUSTIN, CA		SITE PLAN		JOB NO	DRAWING NUMBER		AA-CSL00199-A01		REV. 0
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CSL00199 ANTENNA & RRU SCHEDULE																			
SECTOR	ANTENNAS / MW DISH					REMOTE RADIO UNITS (RRU'S)			FIBER TRUNKS			DC TRUNKS			JUMPERS		MW DISH CABLES (EW 90)		
	POSITION	MFR.	MODEL NO.	AZIMUTH	RAD CENTER	MODEL NO.	QTY	UP OR DOWN	QTY	LENGTH	DIA	QTY	LENGTH	DIA	LENGTH	DIA	QTY	LENGTH	DIA
ALPHA	A1	COMMSCOPE	NNH4-65C-R6-V3	100	70'-0"	RRUS 4449 B5/B12	12	UP	2	100'	2"	6	100'	2"	<12'	1/2"	2	80'	TBD
					RRUS 8843 B2/B66A	<12'									1/2"				
	A2	ERICSSON	AIR6419 B77G	100	72'-9"	N/A									<12'	1/2"			
			AIR6449 B77D	100	69'-2"	N/A									<12'	1/2"			
A3	CCI	OPA65R-BU8DA-K	100	70'-0"	RRUS 4478 B14	<12'	1/2"												
A4	QUINTEL	QUINTEL QS8658-3e	100	70'-0"	RRUS 2012 B29	<12'	1/2"												
					RRUS 4415 B30	<12'	1/2"												
BETA	B1	COMMSCOPE	NNH4-65C-R6-V3	200	70'-0"	RRUS 4449 B5/B12	12	UP	2	100'	2"	6	100'	2"	<12'	1/2"	N/A	N/A	N/A
					RRUS 8843 B2/B66A	<12'									1/2"				
	B2	ERICSSON	AIR6419 B77G	200	72'-9"	N/A									<12'	1/2"			
			AIR6449 B77D	200	69'-2"	N/A									<12'	1/2"			
B3	CCI	OPA65R-BU8DA-K	200	70'-0"	RRUS 4478 B14	<12'	1/2"												
B4	QUINTEL	QUINTEL QS8658-3e	200	70'-0"	RRUS 2012 B29	<12'	1/2"												
					RRUS 4415 B30	<12'	1/2"												
GAMMA	C1	COMMSCOPE	NNH4-65C-R6-V3	340	70'-0"	RRUS 4449 B5/B12	12	UP	2	100'	2"	6	100'	2"	<12'	1/2"	2	80'	TBD
					RRUS 8843 B2/B66A	<12'									1/2"				
	C2	ERICSSON	AIR6419 B77G	340	72'-9"	N/A									<12'	1/2"			
			AIR6449 B77D	340	69'-2"	N/A									<12'	1/2"			
C3	CCI	OPA65R-BU8DA-K	340	70'-0"	RRUS 4478 B14	<12'	1/2"												
C4	QUINTEL	QUINTEL QS8658-3e	340	70'-0"	RRUS 2012 B29	<12'	1/2"												
					RRUS 4415 B30	<12'	1/2"												
N/A		MW DISH	4'-0" DIAMETER	TBD	61'-0"														

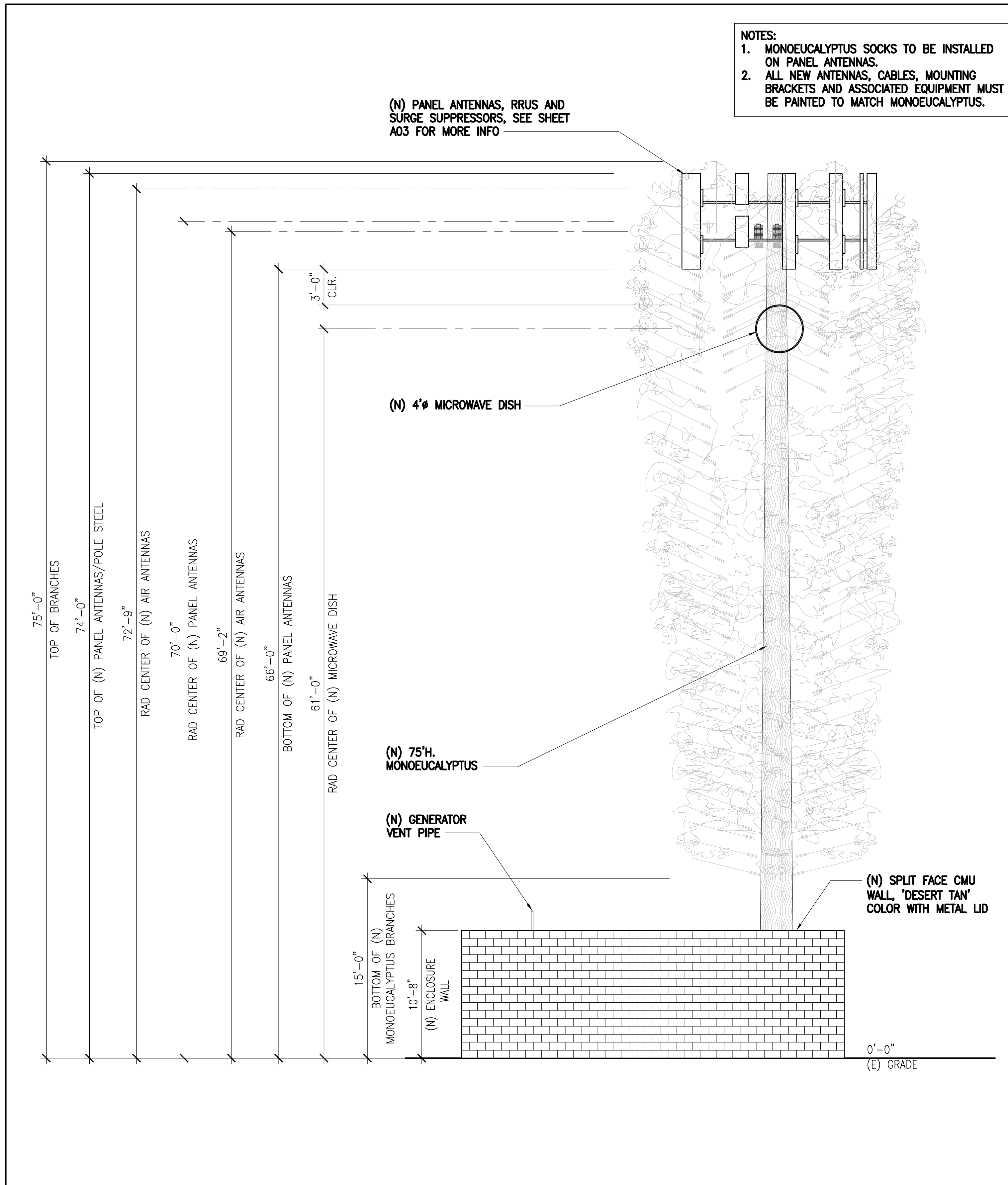
- NOTES:**
1. MONOEUCLYPTUS SOCKS TO BE INSTALLED ON PANEL ANTENNAS.
 2. ALL NEW ANTENNAS, CABLES, MOUNTING BRACKETS AND ASSOCIATED EQUIPMENT MUST BE PAINTED TO MATCH MONOEUCLYPTUS.



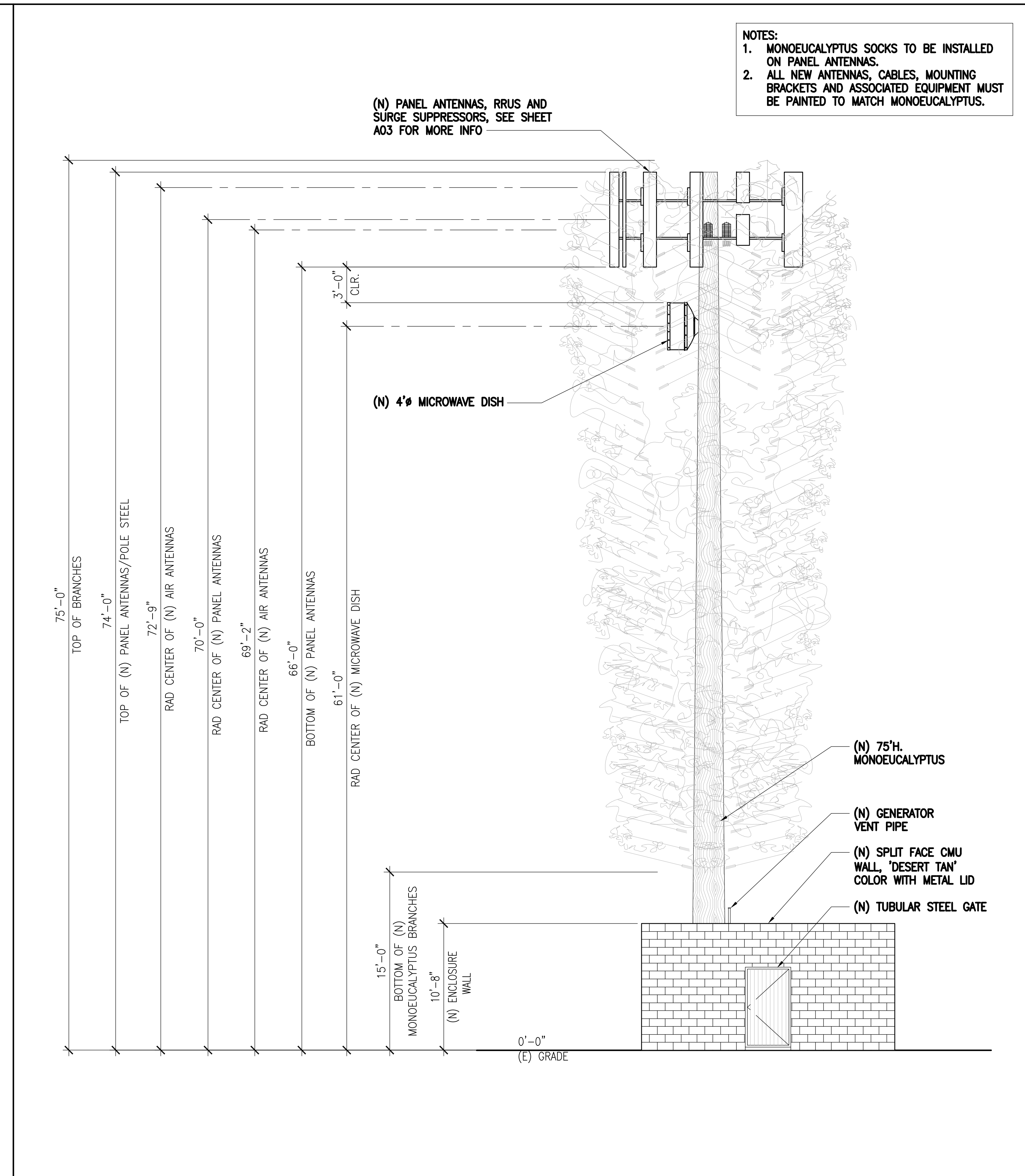
ANTENNA LAYOUT PLAN AND SCHEDULE

<p>ARCHITECTURE ENGINEERING CONSULTING 26 EXECUTIVE PARK SUITE 170 IRVINE CA 92614</p>	<p>CSL00199 WOOLSEY PACE: #MRLOS015323 FA: #13014374 USID: #281535</p> <p>NW OF CACTUS ROAD HWY 395 ADELANTO, CA 92301</p>	<p>1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780</p>	<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>08/19/22</td> <td>ISSUED FOR ZONING PERMIT</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> <tr> <td>A</td> <td>07/25/22</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	08/19/22	ISSUED FOR ZONING PERMIT	RF	BOK	DKD	A	07/25/22	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD		<p>AT&T MOBILITY TUSTIN, CA</p>
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<p>SCALE: AS SHOWN</p>	DESIGNED	DRAWN	<p>ANTENNA LAYOUT PLAN, AND SCHEDULE</p>																				

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NOTES:
 1. MONOEUCALYPTUS SOCKS TO BE INSTALLED ON PANEL ANTENNAS.
 2. ALL NEW ANTENNAS, CABLES, MOUNTING BRACKETS AND ASSOCIATED EQUIPMENT MUST BE PAINTED TO MATCH MONOEUCALYPTUS.



NOTES:
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SOUTH ELEVATION

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

EAST ELEVATION

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

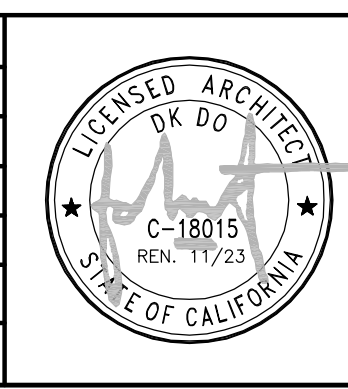
DCI PACIFIC
 A|E|C WORKS
 ARCHITECTURE | ENGINEERING | CONSULTING
 26 EXECUTIVE PARK | SUITE 170
 IRVINE | CA 92614

CSL00199
 WOOLSEY
 PACE: #MRLOS015323 | FA: #13014374 | USID: #281535
 NW OF CACTUS ROAD HWY 395
 ADELANTO, CA 92301

1452 EDINGER AVENUE, 3RD FLOOR
 TUSTIN, CA 92780

NO.	DATE	REVISIONS	BY	CHK	APP'D
0	08/19/22	ISSUED FOR ZONING PERMIT	RF	BOK	DKD
A	07/25/22	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD

SCALE AS SHOWN DESIGNED DRAWN



AT&T MOBILITY
 TUSTIN, CA
ELEVATIONS

JOB NO	DRAWING NUMBER	REV.
	AA-CSL00199-A04	0

OWNER'S NAME: ROY B WOOLSEY TRUST UDTD
 ASSESSOR'S PARCEL NUMBER(S) 3128-531-14-0000

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.

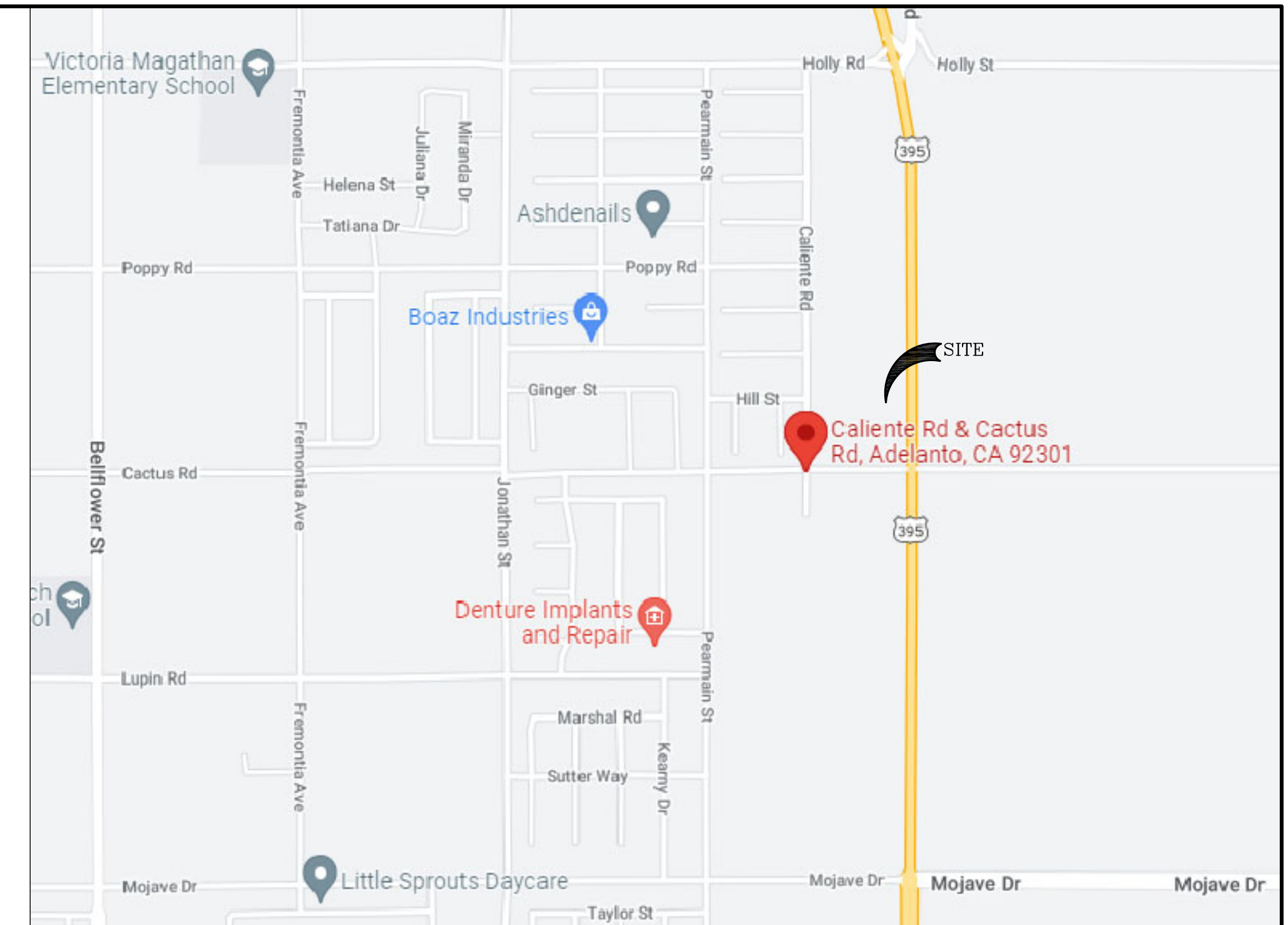
BASIS OF ELEVATIONS: NAVD 1988
 ELEVATIONS ARE BASED ON GPS OBSERVATIONS FROM TWO NATIONAL GEODETIC SURVEY C.O.R.S. REFERENCE STATIONS: 1) JPLM, ELEVATION = 1503.49' AND 2) TORP, ELEVATION = 103.77' WITH GEOID 2012 CORRECTIONS APPLIED.

SITE BENCHMARK IS A TAG FOUND IN THE TOP OF CURB, LOCATED AT THE SW INTERSECTION OF CALIENTE ROAD AND MACON COURT, AS SHOWN HEREON. ELEVATION = 3008.03'

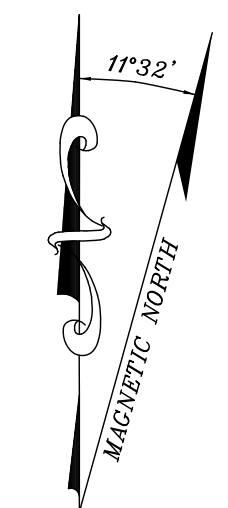
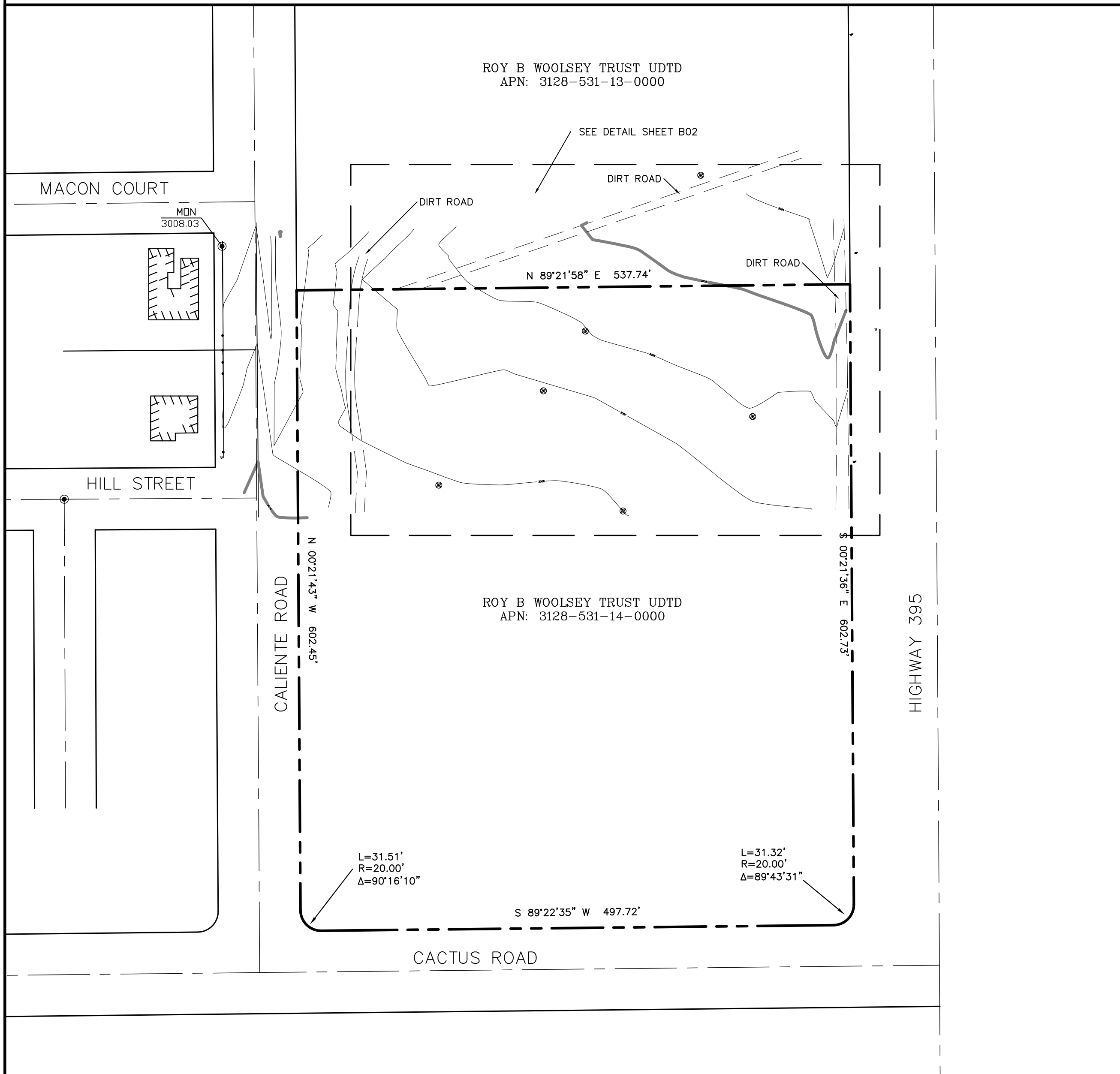
FEMA FLOOD ZONE DESIGNATION: National Flood Insurance Program:

County: SAN BERNARDINO
 Map/Panel: 06071C5795H
 Effective Date: 8/28/2008

The Flood Zone Designation for this site is: ZONE: "D"



VICINITY MAP



LEGEND

- ⊕ FIRE HYDRANT
- MONUMENT FOUND
- ⊗ TREE JOSHUA
- ⊙ UTILITY POLE
- EP EDGE OF PAVEMENT
- ER EDGE OF DIRT ROAD
- FL FLOWLINE CURB & GUTTER
- LIP LIP OF GUTTER
- NG GROUND SPOT ELEVATION
- TC TOP OF CURB
- BOUNDARY LINE
- - - CENTER LINE
- MISC. PROPERTY LINE
- - - MISC. TIE LINE
- RIGHT-OF-WAY LINE
- - - EASEMENT LINE
- X - FENCE LINE
- ////// BUILDING EDGE
- OP --- 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 July 18, 2022

OVERALL SITE PLAN



FLOYD SURVEYING
 34006 GALLERON STREET
 TEMECULA, CA 92592
 OFFICE: (949) 200-0626
 EMAIL: fsi@floydsurveying.com

DCI PACIFIC
 A|E|C WORKS
 ARCHITECTURE | ENGINEERING | CONSULTING
 26 EXECUTIVE PARK | SUITE 170 | IRVINE | CA 92614
 T 949.475.1000 | 949.475.1001 F

CSL00199
 NW OF CACTUS ROAD HWY 395
 ADELANTO, CA 92301

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

NO.	DATE	REVISIONS	BY	CHK	APP'D
0	7/21/22	ISSUED FOR ZONING SUBMITTAL	DAF	DAF	DAF
SCALE		AS SHOWN	DESIGNED	DRAWN	



SHEET TITLE: **TOPOGRAPHIC SURVEY**
 SHEET NUMBER: **B01**

SOURCE DOCUMENTS

SOURCE DOCUMENT 1

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

SOURCE DOCUMENT 2

**Focused Survey for Agassiz's Desert Tortoise, Habitat Assessments for
Burrowing Owl and Mohave Ground Squirrel, and General Biological Resource
Assessment for AT&T SCL00199-Woolsey
January 2023**

**Focused Survey for Agassiz's Desert Tortoise,
Habitat Assessments for Burrowing Owl and Mohave Ground Squirrel, and
General Biological Resource Assessment for a
15.9-acre± Site (AT&T Mobility Site CSL00199/13014374 – Woolsey)
in the City of Adelanto,
San Bernardino County, California**

(U.S. Geological Survey 7.5' Adelanto quadrangle, Township 5 North, Range 5 West, a
portion of the NE ¼ of Section 9, S.B.B.&M.)

Job#: 22-047

Prepared by:

Circle Mountain Biological Consultants, Inc.
P.O. Box 3197

Wrightwood, California 92397

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Website: www.circlemountainbiological.com

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8951 Windsor Parkway

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Email: nflores@impact7g.com

Contact: Nadia Flores

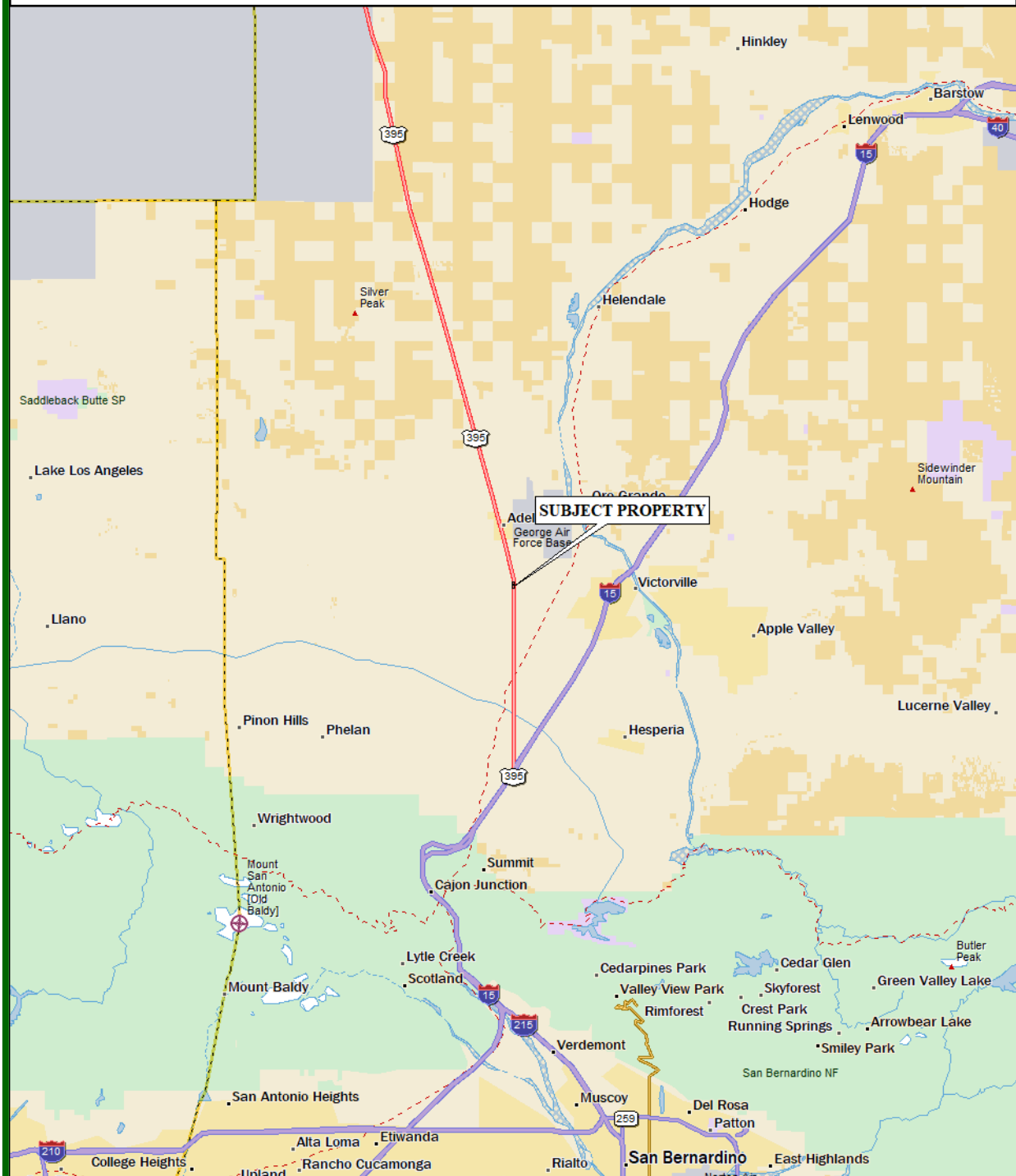
I hereby certify that the statements furnished herein, including attached exhibits, present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Field work conducted for this assessment was performed by me or under my direct supervision. I certify that I have not signed a nondisclosure or consultant confidentiality agreement with the project applicant or applicant's representative and that I have no financial interest in the project.



Circle Mountain Biological Consultants, Inc.
Author and Field Investigator: Sharon Dougherty

November 2022
(Revised January 2023)

Figure 1. AT&T Adelanto Telecom Facility : Vicinity Map



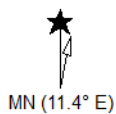
Map produced by Circle Mountain Biological Consultants, Inc. November 2022



Data use subject to license.

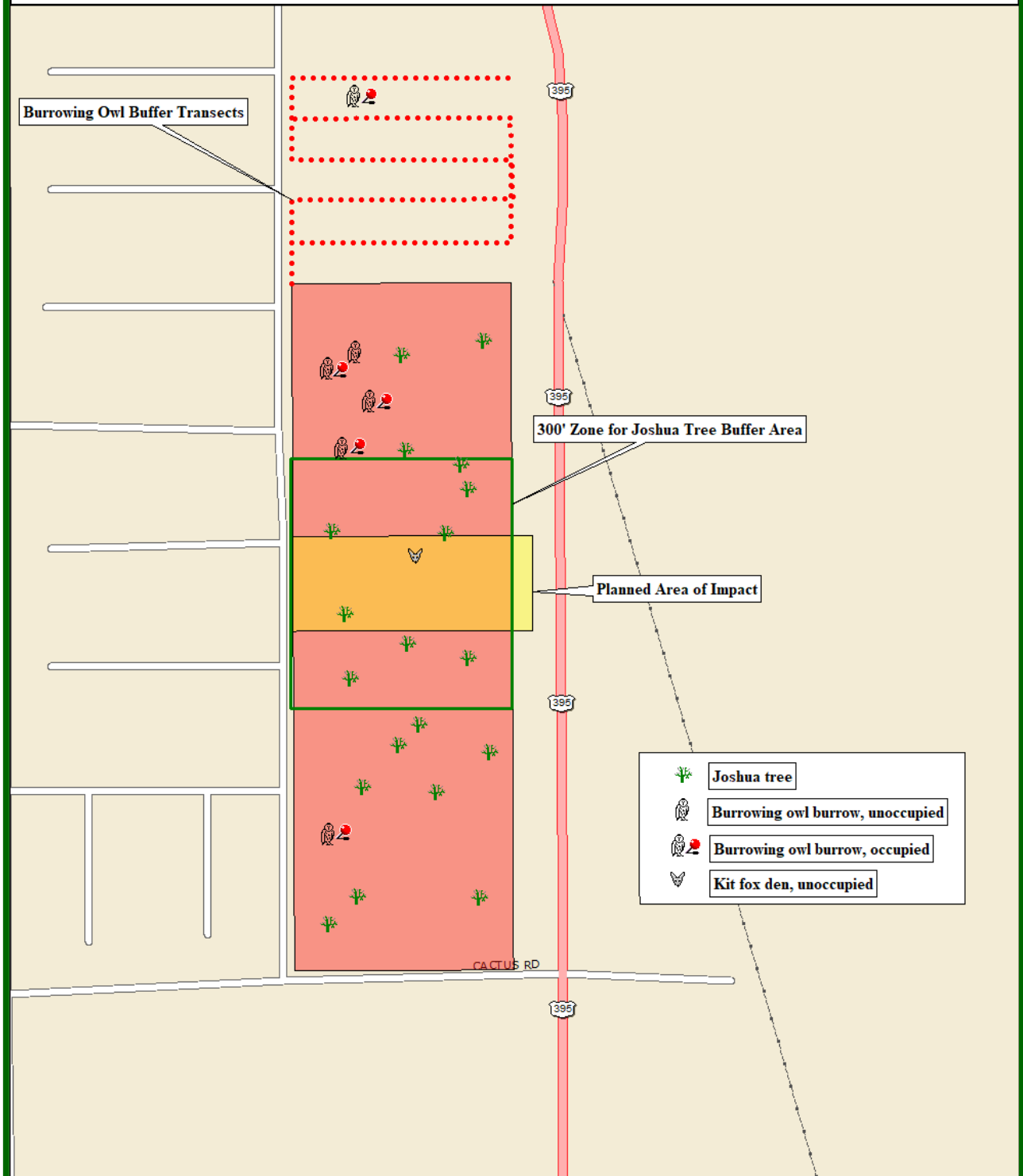
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Data Zoom 8-7

Figure 2. AT&T Adelanto Telecom Facility: Site Map



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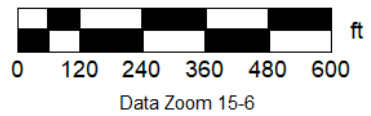
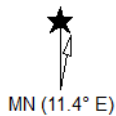
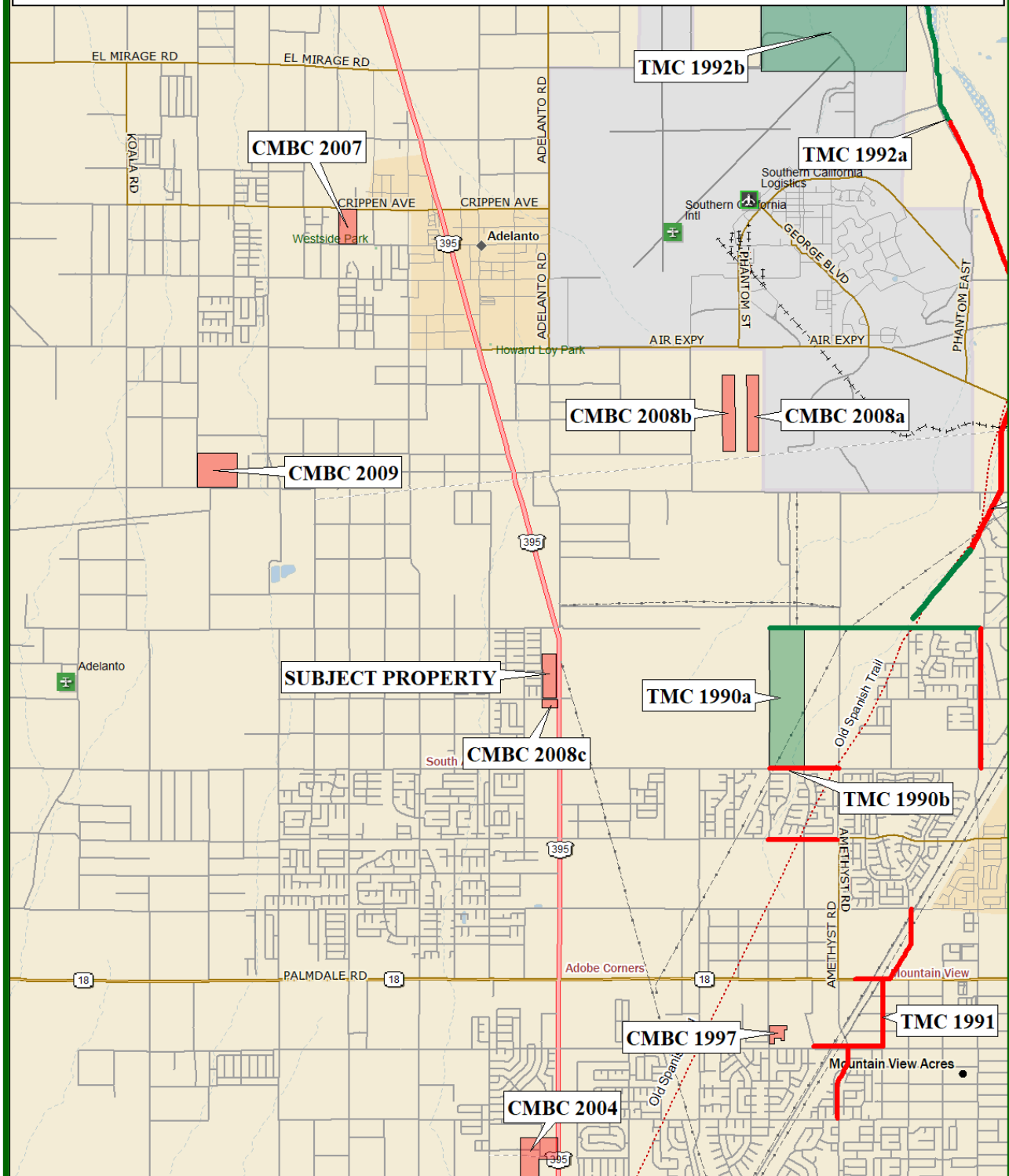


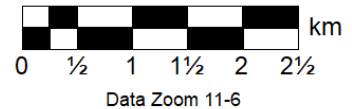
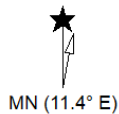
Figure 3. Results of 13 Tortoise Surveys in the Area between 1989 and 2022



Map produced by Circle Mountain Biological Consultants, Inc. November 2022



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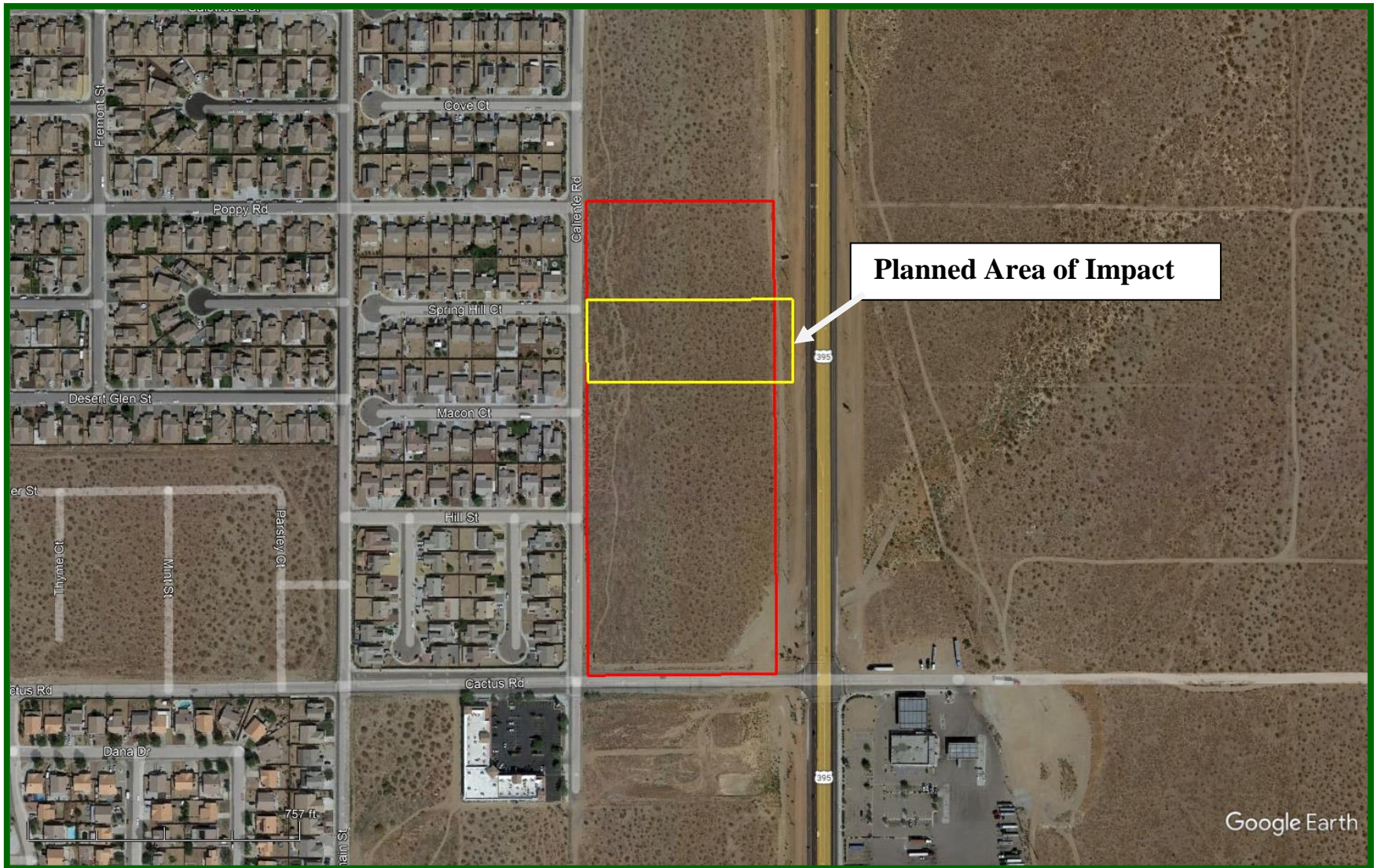
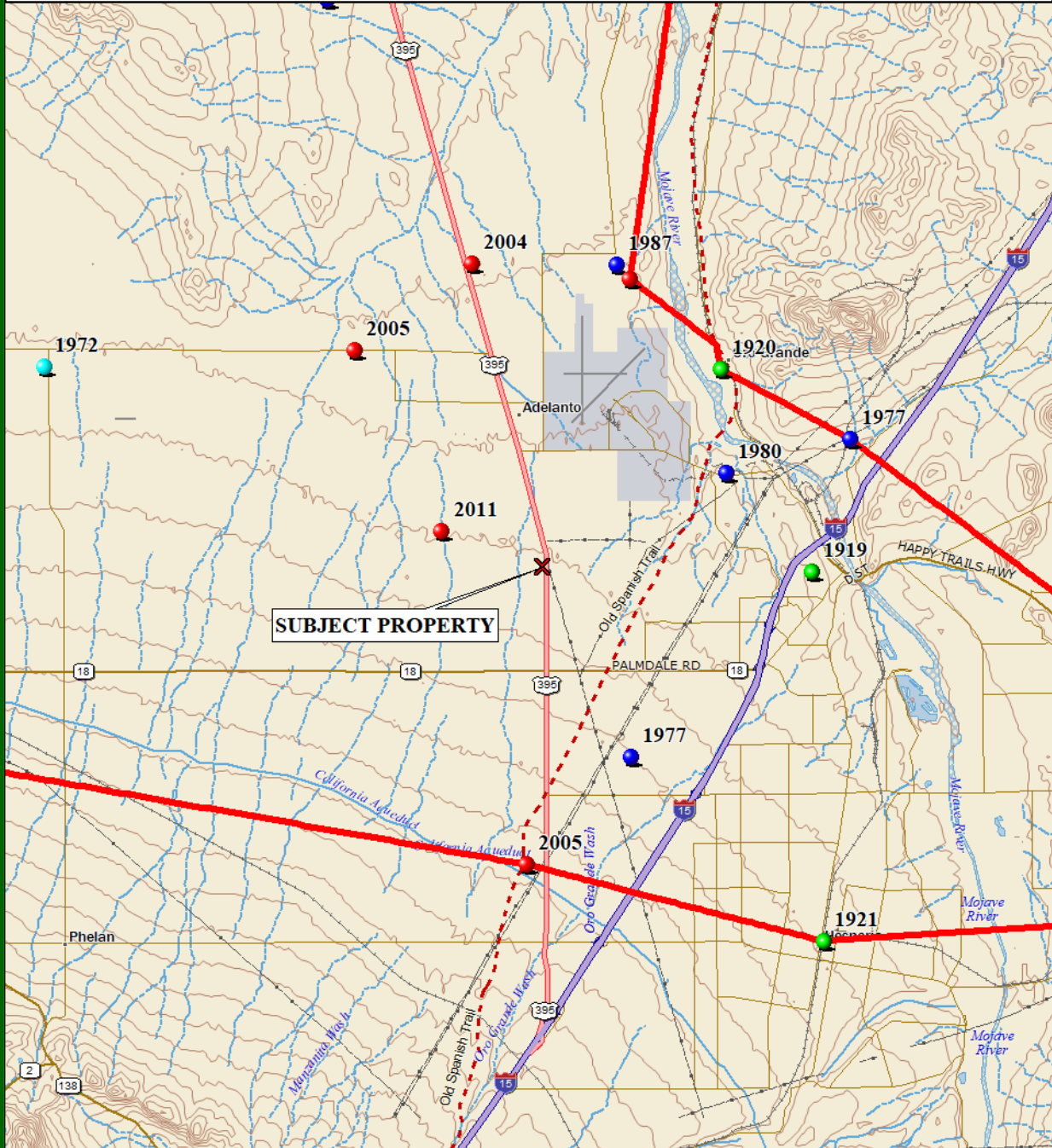


Figure 4. AT&T Telecom Facility: Aerial Photograph (©2022 Google™ Earth)

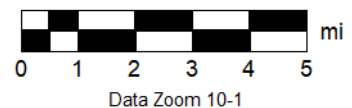
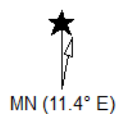
Figure 5. ATT Adelanto Site: Known Mohave Ground Squirrel Locations



Map produced by Circle Mountain Biological Consultants, Inc. November 2022



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Executive Summary

Circle Mountain Biological Consultants, Inc. was contracted by Impact7G, Inc. on behalf of AT&T (Proponent) to perform a focused survey for Agassiz's desert tortoise, habitat assessment for burrowing owl, and a general biological resource assessment on a 15.9-acre± site located in San Bernardino County, California. APNs 3128-531-13 & -14 are adjoining 8.18- and 7.68-acre± parcels, respectively, located north of Cactus Road, between Caliente Road on the west and State Highway 395 on the east, in the City of Adelanto. The legal description for the subject property is Township 5 North, Range 5 West, a portion of the NE ¼ of Section 9, S.B.B.&M. The proposed project area, on which an ATT telecom facility (cell tower) is planned, is located in the center of the property, and comprises approximately 3 acres. (See Figures 1 & 2).

For a total of 7.5 survey hours, between 0800 and 1145 on 17 November 2022, Sharon Dougherty and Sarah Teed of CMBC surveyed the site and adjacent areas as described herein. This entailed a survey of 50 transects, spaced at 10-meter intervals and oriented along an east-west axis throughout the site. Five zone of influence transects were surveyed for detection of burrowing owls at 30-meter intervals on undeveloped property to the north.

Based on DeLorme Topo USA© 10.0 software, elevations on the subject property range from approximately 919 meters (3,015 feet) at the southwest corner down to 914 meters (2,998 feet) at the northeast corner. Terrain is relatively flat. Soils are sandy loam. No blue-line streams designated by the U.S. Geological Survey (USGS) occur on-site. The 21 plant species identified during the survey are listed in Appendix A. The 6 bird, and 4 mammal species identified during the survey are listed in Appendix B.

Based on the absence of tortoise sign onsite and in adjacent areas, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the subject property. As such, no impacts are anticipated, and no mitigation measures are recommended.

Nineteen Joshua trees were identified and evaluated during the site survey. Two of these, both under 3' tall, were located within the planned project area, and a third, larger tree is located just outside the northern boundary of that area. The species is currently a Candidate for listing as an Endangered Species by the California Fish and Game Commission. CMBC recommends that all Joshua trees be avoided to the extent possible. If it is necessary to remove and/or salvage a tree, the California Department of Fish and Wildlife should be contacted to obtain the necessary permissions and procedures.

At least two burrowing owls, with five active burrows and one inactive burrow were found on the site. While none of the active burrows occur in the planned project area, they are close enough to be impacted by construction activities on the site. More detailed information on CDFW's definitions of potential impacts and recommended mitigation and avoidance measures is given in Section 4. Protocol breeding season surveys are likely needed prior to any ground disturbance.

Although a focused Mohave ground squirrel trapping survey was not carried out, CMBC considers that habitat loss and degradation on-site, and isolation of the site from appropriate habitat to the east, west, and south have significantly diminished the likelihood of occurrence. CMBC concludes that Mohave ground squirrel is absent from the site and that protocol trapping surveys are not warranted. The City and/or CDFW would need to concur with this determination (or not) before the conclusion and decision not to trap are considered final.

Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Migratory Bird Treaty Act). Typically, CDFW requires that vegetation not be removed from a project site between March 15 and September 15 to avoid impacts to nesting birds. If it is necessary to commence project construction between March 15 and September 15, a qualified biologist should survey all shrubs and structures within the project site for nesting birds, prior to project activities (including construction and/or site preparation).

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**Focused Survey for Agassiz's Desert Tortoise,
Habitat Assessments for Burrowing Owl and Mohave Ground Squirrel, and
General Biological Resource Assessment for a
15.9-acre± Site (AT&T Mobility Site CSL00199/13014374 – Woolsey)**

in the City of Adelanto,

San Bernardino County, California

(U.S. Geological Survey 7.5' Adelanto quadrangle, Township 5 North, Range 5 West, a
portion of the NE ¼ of Section 9, S.B.B.&M.)

1.0. Introduction

1.1. Purpose and Need for Study. Circle Mountain Biological Consultants, Inc. (CMBC) was contacted by Impact7G, Inc. on behalf of AT&T (Proponent) to perform a focused survey for Agassiz's desert tortoise (*Gopherus agassizii*), habitat assessments for burrowing owl (*Athene cunicularia*) and Mohave ground squirrel (*Xerospermophilus mohavensis*), and a general biological resource assessment on a 15.9-acre± site (AT&T Mobility Site CSL00199/13014374 – Woolsey) located in San Bernardino County, California (see Figures 1 and 2). Since the City of Adelanto planning department does not have a specified protocol for biological technical reports, this report has been prepared, in part, according to County of San Bernardino's Report Protocol for Biological Assessment Reports (County of San Bernardino 2006), which is considered an appropriate, comprehensive format to report results of the field survey and habitat evaluation.

As the California Environmental Quality Act (CEQA) Lead Agency, the City of Adelanto (City) is required to complete an initial study to determine if site development will result in any adverse impacts to rare biological resources. The information may also be useful to federal and State regulatory agencies, including U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), respectively, if the Lead Agency asks them to assess impacts associated with proposed development. Results of CMBC's focused tortoise survey, burrowing owl and Mohave ground squirrel habitat assessments, and general biological resource assessment are intended to provide sufficient baseline information to these agencies to determine if significant impacts will occur and to identify mitigation measures, if any, to offset those impacts.

1.2. Project Description. APNs 3128-531-13 & -14 are adjoining 8.18- and 7.68-acre± parcels, respectively, located north of Cactus Road and between Caliente Road on the west and State Highway 395 on the east, in the City of Adelanto. The legal description for the subject property is Township 5 North, Range 5 West, a portion of the NE ¼ of Section 9, S.B.B.&M. The proposed project area, on which an ATT telecom facility (cell tower) is planned, is located in the center of the property, and comprises approximately 3 acres. (See Figures 1 & 2).

2.0. Methods

2.1. Literature Review. CMBC consulted materials included in our library to determine the nearest tortoise locations and other special status plant and animal species that have

been reported from the vicinity of the subject property. Of relevance given their proximity to the subject property are 12 focused tortoise surveys completed on 12 sites, located between approximately 60 feet south (CMBC 2008c) and 5 miles north of the parcel (TMC 1992b), between 1990 (TMC 1990a) and 2009 (CMBC 2009), which, along with the subject property, are mapped in Figure 3. These and other materials used in the completion of this report are listed in Section 5.0, below.

In accordance with *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFG 2009), CMBC also consulted the latest version of the California Natural Diversity Data Base (CDFW 2022a) for rare plant (and animal) records reported from the USGS 7.5' Adelanto quadrangle, which encompasses the site.

2.2. Field Survey.

2.2.1. *Survey and Habitat Assessment Protocols.* A significant paper was published in June 2011 (Murphy et al. 2011) whereby the “desert tortoise” of the Mojave Desert was split into two species, including *Gopherus agassizii*, referred to as “Agassiz’s desert tortoise,” and a newly described species, *G. morafkai*, referred to as “Morafka’s desert tortoise,” which occurs in the Sonoran Desert. According to Murphy et al. (2011), “...this action reduces the distribution of *G. agassizii* to only 30% of its former range. This reduction has important implications for the conservation and protection of *G. agassizii*, which may deserve a higher level of protection.” Then in 2016 (Edwards et al. 2016), a third species of tortoise was described, referred to as the “Goode’s Thornscrub Tortoise” (*Gopherus evgoodei*), which further reduced the perceived range of Morafka’s desert tortoise. Agassiz’s desert tortoise is the threatened species that occurs in the region surrounding the subject property.

For **Agassiz’s desert tortoise**, CMBC followed the presence-absence survey protocol first developed by the USFWS in 1992 and revised in 2019. USFWS (2019) protocol recommends surveying transects at 10-meter (30-foot) intervals throughout all portions of a given parcel and its associated action area. The *action area* is defined by regulation as all areas to be affected directly or indirectly by proposed development and not merely the immediate area involved in the action (50 CFR §402.02). For this site, the action area is the same as the subject property. Since the site is smaller than 500 acres, it may be surveyed year-round but there is no opportunity to estimate the density of tortoises on the 14.9-acre± subject property (USFWS 2019), particularly for this site where no tortoise sign was found.

For **burrowing owl**, although the formal habitat assessment does not specify a given interval to survey a site (Appendix C in CDFG 2012), subsequent breeding and nonbreeding studies identify that transects are surveyed at 7 to 20 meters (23 to 65 feet) apart, with five additional transects surveyed at 30-meter intervals out to 150 meters (500 feet) in adjacent areas in potential habitat (i.e., excluding areas substantially developed for commercial, residential, and/or industrial purposes) (Appendix D in CDFG 2012). With its narrower transect intervals, the tortoise survey is sufficient to cover the site for

burrowing owl. The focus of the survey is to find and inspect all burrows sufficiently large to be used by burrowing owls. 22 such burrows were inspected for sign of burrowing owl. Importantly, this methodology is considered a formal *habitat assessment* for presence of burrowing owls, which can be conducted any time of the year. Since burrowing owls and sign were found, it will be necessary to perform breeding burrowing owl surveys during the spring and summer as outlined in CDFG (2012).

For **Joshua tree**, in October 2020, the California Fish and Game Commission accepted as complete a petition to list Joshua tree as a California Endangered Species. The Commission had a year to consider the petition and publish its determination, which was expected in October 2021 and has been extended for another six months. Dougherty recorded locations of 19 Joshua trees using a Garmin GPS unit, which has a horizontal accuracy of 2 to 3 meters. Additional information taken for each tree included number of trunks, height(s), range of heights from the shortest to tallest trunks, and a general health assessment of poor, moderate, or good based on the color of leaves (i.e., spikes), necrosis on the leaves, posture (i.e., erect versus leaning), dead versus live branches on each tree, and adherence of bark to the trunk(s). The tabulated information for each Joshua tree is included in Appendix E.

For **Mohave ground squirrel**, some jurisdictions require that habitat assessments be performed by individuals certified by CDFW for trapping the species. Ed LaRue who performed the fieldwork and drafted this assessment possesses a Mohave ground squirrel Memorandum of Understanding with CDFW, dated January 21, 2020, as an attachment to scientific collecting permit (SC-001544), which expires on December 31, 2022. The primary assessment herein asks the following questions: (1) Is the site within the range of the species? (2) Is there native habitat with a relatively diverse shrub component? And (3) is the site surrounded by development and therefore isolated from potentially occupied habitat?

2.2.2. Field Survey Methods. For a total of 7.5 survey hours, between 0800 and 1145 on 17 November 2022, Sharon Dougherty and Sarah Teed of CMBC surveyed the site and adjacent areas as described herein. This entailed a survey of 50 transects, spaced at 10-meter (30-foot) intervals and oriented along an east-west axis throughout the 14.9-acre± site As depicted in Figure 2, five zone of influence transects were surveyed for detection of burrowing owls at 30-meter (100-foot) intervals on undeveloped property to the north. Copies of CMBC's data sheet completed in the field and USFWS' (2019) pre-project survey data sheet are included in this report (see Appendix C).

As the site was surveyed, Dougherty kept tallies of observable human disturbances encountered on the 25 transects she surveyed. The results of this method provide *encounter rates* for observable human disturbances. For example, two roads observed on each of 10 transects yields a tally of 20 roads (i.e., two roads encountered 10 times). Habitat quality, adjacent land uses, and this disturbance information are discussed below in Section 3.2 relative to the potential occurrence of Agassiz's desert tortoise and other special status species on and adjacent to the subject property.

Weather conditions recorded at the beginning of the survey included temperatures measured approximately 5 centimeters (2 inches) above the ground, percent cloud cover, and wind speeds measured by a hand-held Kestrel® weather and wind speed meter. The temperature was 47°F, winds ranged from 1-2 miles per hour from the southwest, and skies were clear.

All plant and animal species identified during the survey were recorded in field notes. Garmin® hand-held, global positioning system (GPS) units were used to survey straight-line transects and record Universal Transverse Mercator (UTM) coordinates (North American Datum – NAD 83) for property boundaries, rare species locations, and other pertinent information (Appendix C). A cell phone was used to take representative digital photographs (Appendix D), with locations and directions of exhibits shown in Figure 6. ©2022 Google™ Earth was accessed via the internet to provide available aerial photographs of the subject property and surrounding areas (Figure 4).

3.0. Results

3.1. Common Biological Resources. The common plant and animal species identified during the survey are listed in Appendices A and B, respectively. Based on DeLorme Topo USA® 10.0 software, elevations on the subject property range from approximately 919 meters (3,015 feet) at the southwest corner down to 914 meters (2,998 feet) at the northeast corner. Terrain is relatively flat. Soils are sandy loam. No blueline streams designated by the U.S. Geological Survey (USGS) occur on-site.

3.1.1. *Common Flora*. The 21 plant species identified during the survey are listed in Appendix A. The plant community present on the site is best described as degraded *Larrea tridentata* – *Ambrosia dumosa* shrubland alliance, based on the system devised by Sawyer, Keeler-Wolf, and Evens (2008) in collaboration with the California Native Plant Society (CNPS) and CDFW. Dominant perennials include creosote bush (*Larrea tridentata*), burrobrush (*Ambrosia dumosa*), and Nevada joint-fir (*Ephedra nevadensis*). Joshua trees (*Yucca brevifolia*) are scattered throughout the site. Few annual plant species were observed, likely due to the timing of the survey in late fall/early winter. These were mostly disturbance tolerant species, such as annual bur-sage (*Ambrosia acanthicarpa*), or non-native, invasive species, such as split-grass (*Schismus* sp.), puncture vine (*Tribulus terrestris*), and Saharan mustard (*Brassica tournefortii*).

3.1.2. *Common Fauna*. The 6 bird and 4 mammal species identified during the survey are listed in Appendix B. The birds observed are common Mojave desert species, often found in suburban areas, and include common raven (*Corvus corax*), house finch (*Carpodacus mexicanus*), horned lark (*Eremophila alpestris*), rock dove or pigeon (*Columbia livia*), and American kestrel (*Falco sparverius*), as well as burrowing owl. Mammals detected by burrows or other sign included California ground squirrel (*Otospermophilus beecheyi*), kangaroo rat (*Dipodomys* sp.), and kit fox (*Vulpes macrotis*).

No reptiles were observed, likely due to cold temperatures. Locally common reptile species that may occur include side-blotched lizard (*Uta stansburiana*), zebra-tailed lizard (*Callisaurus draconoides*), long-nosed leopard lizard (*Gambelia wislizenii*), desert horned lizard (*Phrynosoma platyrhinos*), desert night lizard (*Xantusia vigilis*), red racer (*Masticophis flagellum*), glossy snake (*Arizona elegans*), gopher snake (*Pituophis melanoleucus*), long-nosed snake (*Rhinocheilus lecontei*), and various rattlesnake species (*Crotalus* spp.).

3.2. Uncommon Biological Resources.

3.2.1. *Agassiz's Desert Tortoise.* No tortoise sign was found either onsite or in adjacent areas during this focused, protocol survey for the species (USFWS 2019). Based on the absence of tortoise sign on the subject property, in adjacent areas, and reported from the region (see Figure 3), CMBC concludes that Agassiz's desert tortoise is absent from the subject property and action area. Also, there is no likelihood of wild tortoises entering the site from adjacent areas, either to pass through the site or establish residency.

The site had been heavily degraded. A strip of approximately 4 acres along the western boundary adjacent to Caliente Road has been brushed at some point, while leaving Joshua trees in place. Dirt mounds and other evidence of past use of heavy equipment is evident in this area, and an off-highway vehicle trail/road has been established. An area of about ½ acre at the southeastern corner has been made barren, likely due to repeated vehicle encroachment. A dirt road paralleling Highway 395 runs adjacent to the eastern boundary and passes through the eastern edge of the planned area of disturbance. Windblown trash is ubiquitous on the site, as well as vegetation dumps and dumped gravel and asphalt along the eastern boundary. Encounter rates for observable human disturbances included (in descending order of prevalence) vehicle tracks, (53 encounters), roads/OHV trails (35), dump sites (7), and dog sign (1). Ornamental plants, including bamboo and non-native cactus are encroaching on the site in a few places.

As depicted in Figure 3, CMBC personnel have surveyed 12 sites within approximately 5 miles of the subject property. Evidence of desert tortoise was found on only two of these surveys, one in 1990 and one in 1992.

With the publication of the Bureau of Land Management's (BLM) Record of Decision (BLM 2016), the Desert Renewable Energy Conservation Plan (DRECP) revised the 1980 California Desert Conservation Area Plan (CDCA Plan; BLM 1980) in significant ways for the conservation and recovery of desert tortoises in the California Deserts. Although desert tortoise critical habitat was not changed (USFWS 1994a), Desert Wildlife Management Areas (DWMAs; USFWS 1994b) and Multiple Use Classes on BLM lands were eliminated. In addition to critical habitat, the two main designated areas under the DRECP CDCA Plan amendment that provide for tortoise conservation and recovery are Areas of Critical Environmental Concern (ACECs) and California Desert National Conservation Lands (CDNCLs). The subject property is not found within any of these conservation areas.

The subject property is approximately 7 miles southwest of the nearest CDNCL-designated lands. As per the official DRECP website (www.drecpdatabasin.org) and Appendix B, which depicts boundaries of management areas, the subject property is located 10 miles south of the nearest desert tortoise ACEC, which is the Fremont-Kramer ACEC. The site is not found within Agassiz's desert tortoise critical habitat, which was designated in 1994 (U.S. Fish and Wildlife Service 1994a). The nearest critical habitat area is the Fremont-Kramer Critical Habitat Unit, which is the same as the Fremont-Kramer ACEC.

3.2.2. *Other Special Status Species.* U.S. Fish and Wildlife Service (2008), California Department of Fish and Wildlife [CDFW 2022a for California Natural Diversity Data Base (CNDDDB); 2022b for Special Plant Species list; 2022c for Special Animal Species list; and California Native Plant Society (CNPS 2022)] maintain lists of animals and/or plants considered rare, threatened, or endangered, which are herein collectively referred to as “special status species.” Regulatory agency-designated special status species that were identified during the current survey included Joshua tree, kit fox, and burrowing owl. Life history and occurrence information for rare species observed during the survey, listed in the CNDDDB report for the Adelanto Quadrangle, or on one or more of the sites depicted in Figure 3 are given in the next few subsections.

As described earlier, the **Joshua tree** is currently a Candidate for listing as a California Endangered Species. Nineteen Joshua trees were observed on the site, and detailed information on these is given in Appendix E. Only two of these trees were found within the designated project area; however eight are within 150 feet of the project area boundary.

Burrowing owl is designated as a California Species of Special Concern by CDFW (2022c), as a Bird of Conservation Concern by the USFWS (2008) and is considered Sensitive by the BLM (CDFW 2022a). It is one of the focal species specifically sought during field surveys, and is usually detected by distinctive feathers, zygodactyl (x-shaped) tracks, and whitewash (fecal material deposited away from burrows may be from other bird species). Although pellets and feathers are sufficiently distinctive that they may be identified away from burrows, it is one or more of these signs at sufficiently large burrows that are the most definitive means of determining burrowing owl use of a given site.

Five burrowing owl burrows with recent sign and one that appeared to be inactive were detected on the subject property. A single owl was observed at each of three burrows and two owls were seen at another. It is not clear whether there were more than two owls present, as the birds were seen moving among burrows and elsewhere on the site. While the active burrows found were not located within the planned project area, the four found on the subject property are within 500 feet of the project area and birds occupying these burrows could be impacted by the project. There are eight records from the CNDDDB (CDFW 2022a) for this species from the Adelanto quadrangle, indicating that the species is well known from the region.



An abandoned **kit fox** den was found on the subject property, within the planned project area. However, no recent sign of the species was found on-site, and kit fox appears to be absent at the present time.

Prairie falcon (*Falco mexicana*) is designated as a Watch List species by CDFW (2022b) and a Bird of Conservation Concern by the USFWS (2008). This bird was observed 3.1 miles north-northwest of the subject property in 2007 (CMBC 2007). There are no suitable nesting substrates (cliff faces and other inaccessible areas) onsite but foraging habitat exists throughout the subject property.

Northern harrier (*Circus hudsonious*) is a California Species of Special Concern (nesting) and has been observed 3.3 miles north-northeast of the subject property (TMC 1992). This species is known from both wet and dry habitats in open terrain, where good ground cover is somewhat dense. Habitat on the subject property is not appropriate, and the species is considered absent from the subject property.

Swainson's hawk (*Buteo swainsoni*) is listed as Threatened in California while nesting, is BLM Sensitive, and is considered a Bird of Conservation Concern by the USFWS. Swainson's hawks were reported nesting in the Adelanto area in 1939 (CDFW 2022a), but there are no recent records of nesting in the vicinity. This species is typically associated with plains, dry grassland, farms, and ranches. It nests in scattered groves of trees surrounded by open country. This bird is considered absent from the subject property.

Sharp-shinned hawk (*Accipiter striatus*) is designated as a Watch List species by CDFW (2022b). It has been observed 3.3 miles north-northeast of the subject property (TMC 1992). This species preys mostly on birds of about sparrow size up to robin size, sometimes up to the size of quail. Other, less commonly eaten, prey include rodents, bats, squirrels, lizards, frogs, snakes, large insects. It typically nests in dense conifer groves, usually 20-60' above ground. It would not be expected to nest on the subject property, although it could forage over the site.

Cooper's hawk (*Accipiter cooperi*) is a seasonal raptor that is designated as a Watch List species by CDFW (2022b). Cooper's hawks have been observed 3.3 miles north-northeast of the subject property (TMC 1992). This species is often observed in suburban habitats. Foraging habitat is present on the subject property, where plenty of small and medium-sized birds on which Cooper's hawks can prey. The species would not be expected to nest on the site, since it prefers large coniferous or deciduous trees.

LeConte's thrasher (*Toxostoma lecontei*) is designated as a California Species of Special Concern by CDFW (CDFW 2019) and as a Bird of Conservation Concern by the USFWS (2008). These birds have been observed 3.3 miles north-northeast of the subject property (TMC 1992). In addition, there are four records in the CNDDDB (CDFW 2022a) from 1986 and 1987, from about 4.4 to 5.7 miles north of the subject property. LeConte's thrashers may nest in several cactus species, particularly silver cholla (*Cylindropuntia echinocarpa*), and in larger streamside shrubs. Habitat on the subject property is very marginal for this species, and they are not expected to occur.

Loggerhead shrike (*Lanius lanovicianus*) is designated as a California Species of Special Concern by CDFW (2019) and a Bird of Conservation Concern by the USFWS (2008). Shrikes have been observed 3.3 miles north-northeast of the subject property and 3.1 miles north-northwest (TMC 1992, CMBC 2007). This species is known from a variety of open habitats, including desert scrub. They feed on insect and other arthropods, amphibians, reptiles, small mammals, and birds, and are known for their habit of impaling prey on thorns or barbed wire as cached food for later consumption. Habitat on the subject property is very marginal for this species, and they are not expected to occur.

Mohave ground squirrel is designated as a Threatened species by the California Fish and Game Commission and is not federally listed. Despite two petitions, one in 1993 and another in 2005, to list the Mohave ground squirrel as a federally Endangered species, the USFWS ruled in both instances that listing was not warranted at those times. In recent years, the CDFW has considered three criteria in assessing potential impacts to the Mohave ground squirrel: (1) Is the site within the range of the species? (2) Is there native habitat with a relatively diverse shrub component? (3) Is the site surrounded by development and therefore isolated from potentially occupied habitats?

Figure 5 shows known locations of Mohave ground squirrels relative to the subject property (CDFW 2022a) and the extrapolated range of the species (Gustafson 1993; U.S. Bureau of Land Management 2005). The nearest reported occurrence was approximately 2.2 miles to the west-northwest where a squirrel was found in 2011. Other proximate occurrences have been 4.2 miles east-northeast (1980), 4.3 miles southeast (1977), 5.4 miles east (1919), and 5.9 miles northwest (2005).

When a line is drawn to connect the known occurrences to determine the approximate range of the species (the "red line" in Figure 5 from U.S. Bureau of Land Management 2005), the site is approximately 5.5 miles west of the extrapolated eastern boundary, or approximately 5.5 miles inside the suspected species range.

Mohave ground squirrel has been reported between 550 meters (1,800 feet) and 1,710 meters (5,620 feet) elevation from a wide range of habitats including creosote bush scrub, saltbush scrub, Joshua tree woodland, juniper woodland, and Mohave mixed woody scrub (U.S. Bureau of Land Management 2005). Although at 915 meters (3,000 feet) elevation, the site is within the known elevational range of the species, There is a relatively low level of diversity of native perennial plants, with 6 shrub species identified, of which several are represented by only a few shrubs.

Based on studies by Phil and Barbara Leitner (as summarized in U.S. Bureau of Land Management 2005), in the northern part of the range, winterfat and spiny hopsage are ecologically important shrubs for Mohave ground squirrel. Neither species was observed on the site. In any case, the presence of these plants does NOT imply that the Mohave ground squirrel occurs. There are no data to suggest that these plants are important to the species in the south as they appear to be in the Coso Range, near the northern extent of the Mohave ground squirrel known range.

Finally, contiguous lands to the south and west are developed, with Highway 395 immediately to the east, and patchwork development with a fair amount of native habitat to the north of the site.

Given the above information, CMBC concludes that the Mohave ground squirrel has a relatively low potential to occur on the subject property, based on poor habitat quality and the site being isolated in three directions from other suitable habitat.

3.3. Other Protected Biological Resources.

3.3.1. *Stream Courses.* No blue-line streams or washes are present on the site.

3.3.2. *Protected Plant Species.* At the State level, the 1998 Food and Agricultural Code, Division 23: California Desert Native Plants, Chapter 3: Regulated Native Plants Act, Section 80073 states: The following native plants, or any parts thereof, may not be harvested except under a permit issued by the commissioner or the sheriff of the county in which the native plants are growing:

- (a) All species of the family Agavaceae (century plants, nolin, yuccas).
- (b) All species of the family Cactaceae (cacti), except for the plants listed in subdivisions (b) and (c) of Section 80072 (i.e., saguaro and barrel cacti), which may be harvested under a permit obtained pursuant to that section.
- (c) All species of the family Fouquieriaceae (ocotillo, candlewood).
- (d) All species of the genus *Prosopis* (mesquites).
- (e) All species of the genus *Cercidium* (palo verdes).
- (f) *Senegalia (Acacia) greggii* (catclaw acacia).
- (g) *Atriplex hymenelytra* (desert holly).
- (h) *Dalea (Psoralea) spinosa* (smoke tree).
- (i) *Olneya tesota* (desert ironwood), including both dead and live desert ironwood.

Joshua trees are the only living plant species included in one or both above lists that were observed on the subject property. (A few dead silver cholla (*Cylindropuntia echinocarpa*) were present on the site.)

4.0. Conclusions and Recommendations

4.1. Impacts to Agassiz’s Desert Tortoise and Proposed Mitigation. Based on the absence of tortoise sign onsite and in adjacent areas, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the subject property. As such, no impacts are anticipated, and no mitigation measures are recommended.

Whereas USFWS survey protocols historically indicated that the results of a given survey were valid for the period of only one year (USFWS 2010 and 2018), according to the revised, 2019 USFWS pre-project survey protocol, “*If the survey data are more than a year old, we encourage project proponents to contact us at the earliest possible time to allow us to assess the specific circumstances under which the data were collected (e.g., time of year, drought/rainfall conditions, size and location of the site, etc.) and to discuss whether additional surveys would be appropriate. Spatial information can be provided in pdf and GIS formats.*” At the time of this writing, the Palm Springs office of the USFWS would be the appropriate office to contact [(760) 322-2070] to determine if another survey should be performed prior to ground disturbance if it does not occur before 17 November 2023.

Regardless of survey results and conclusions given herein, tortoises are protected by applicable State and federal laws, including the California Endangered Species Act and Federal Endangered Species Act, respectively. As such, if a tortoise is found onsite at the time of construction, all activities likely to affect that animal(s) should cease and the County contacted to determine appropriate steps.

Importantly, nothing given in this report, including recommended mitigation measures, is intended to authorize the incidental take of Agassiz’s desert tortoises during site development. Such authorization must come from the appropriate regulatory agencies, including CDFW (i.e., authorization under section 2081 of the Fish and Game Code) and USFWS [i.e., authorization under section 10(a)(1)(B) of the Federal Endangered Species Act].

4.2. Impacts to Other Biological Resources and Proposed Mitigation.

4.2.1 *Other Special Status Species.* Based on the field survey and habitat assessment, CMBC concludes that none of the following special status species reported from the region will be adversely affected by site development: Northern harrier, LeConte’s thrasher, loggerhead shrike. As such, no adverse impacts have been identified and no mitigation measures are recommended.

Those species either identified during the current survey or for which suitable habitats are present include prairie falcon, Cooper's hawk, sharp-shinned hawk, Joshua tree, burrowing owl, and Mojave ground squirrel.

Prairie falcons, sharp-shinned hawks, and Cooper's hawks could experience a small (± 3 acres), incremental loss of foraging habitat.

Nineteen **Joshua trees** were identified and evaluated during the site survey. Two of these, both under 3' tall, were located within the planned project area, and a third, larger tree is located just outside the northern boundary of that area.

The species is currently a Candidate for listing as an Endangered Species by the California Fish and Game Commission. CMBC recommends that all Joshua trees be avoided to the extent possible. If it is necessary to remove and/or salvage a tree, the California Department of Fish and Wildlife should be contacted to obtain the necessary permissions and procedures. CDFW has recently recommended the following analysis for impacts to Western Joshua trees (WJT) and specific permitting and mitigation for a project in Adelanto and are likely to have similar requirements for this project.

- "1) assessing potential impacts to WJTs within a 186-foot buffer zone for each WJT (Vander Wall et al. 2006),
- 2) implementation of a 300-foot buffer around each WJT not scheduled for removal
- 3) a mitigation strategy addressing impacts to Joshua tree individuals, the WJT seedbank, and indirect impacts to WJT, as noted above."

"Western Joshua Tree Take: If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an incidental take permit (ITP) from California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), prior to the relocation, removal, or take (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Take of any CESA listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof the document has been circulated." (CDFW to City of Adelanto Planning, 7 November 2022)

Eight trees are within 150 feet of the project area boundary. (See Figure 2.) Since CDFW recommends a 300-foot buffer around each Joshua tree, development should be planned to avoid impacts within 150 feet of each of these trees to the extent possible. A detailed project plan would be needed to carry out such an analysis. Where such a buffer cannot be established, it may be necessary to obtain an ITP for the affected Joshua trees.

For **burrowing owl**, CDFG (2012) has stipulated that the following should be considered impacts to the species:

- *Disturbance within 50 meters (approximately 160 feet), which may result in harassment of owls at occupied burrows;*
- *Destruction of natural or artificial burrows (i.e., culverts, concrete slabs, and debris piles that provide shelter to burrowing owls); and*
- *Destruction and/or degradation of foraging habitat adjacent [within 100 meters (approximately 320 feet)] of an occupied burrow(s).*

If impacts cannot be avoided, specified mitigation measures include (a) avoiding occupied burrows during the breeding season, between February 1 and August 31; (b) purchasing and permanently protecting 6.5 acres of foraging habitat per pair or unpaired resident bird impacted; (c) creating new burrows or enhancing others when destruction of occupied burrows is unavoidable; (d) implementing passive relocation if owls must be moved; and (e) provide funding for long-term management and monitoring of protected lands.

Given this information, CMBC reiterates that it is highly advisable (and cost effective) to avoid impacts. CDFG (2012) states the following:

If avoidance is the preferred method of dealing with potential project impacts, then no disturbance should occur within 50 meters (approximately 160 feet) of occupied burrows during the nonbreeding season of September 1 through January 31 or within 75 meters (approximately 250 feet) during the breeding season of February 1 through August 31. Avoidance also requires that a minimum of 6.5 acres of foraging habitat be permanently preserved contiguous with occupied burrow sites for each pair of breeding burrowing owls (with or without dependent young) or single unpaired resident bird. The configuration of the protected habitat should be approved by the Department [CDFW].

The Proponent should contact the pertinent office of the CDFW to determine appropriate steps to either avoid impacts or mitigate them according to latest CDFW standards.

Although a focused **Mohave ground squirrel** trapping survey was not performed, CMBC assessed habitats and reviewed available information to provide a professional opinion as to the presence or absence of this species on the subject property. Given the information discussed herein, CMBC concludes that habitat loss and degradation onsite and isolation of the site from the east, west, and south have significantly diminished the likelihood of occurrence, and judges that Mohave ground squirrel is absent from the site and that protocol trapping surveys are not warranted. The City and/or CDFW would need to concur with this determination (or not) before the conclusion and decision not to trap are considered final.

4.2.2. *Other Protected Biological Resources.*

4.2.2.a. Bird Nests. Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (As listed under the Migratory Bird Treaty Act). CDFW has recently recommended that regardless of the timing of construction, a qualified biologist should survey all shrubs and structures within the project site for nesting birds, prior to project activities (including construction and/or site preparation). Typically, nesting occurs between March 15 and September 15, and timing construction outside of this period is recommended to avoid delays due to the above requirements to avoid impacts to nesting birds.

Surveys should be conducted at the appropriate time of day during the breeding season, and surveys would end no more than three days prior to clearing. CDFW is typically notified in writing prior to the start of the surveys. Documentation of surveys and findings should be submitted to the CDFW within ten days of the last survey. If an active bird nest is located, the plant in which it occurs should be left in place until the birds leave the nest. No construction is allowed near active bird nests of threatened or endangered species.

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Appendix A. Plant Species Detected

The following plant species were identified on-site during the focused floral inventory described in this report. Protected plant species are highlighted in red and signified by “(PPS)” following the common names. The species found only in adjacent areas is signified by “+.”

GNETAE

Ephedraceae

Ephedra nevadensis

ANGIOSPERMAE: DICOTYLEDONES

Asteraceae

Ambrosia acanthicarpa

Ambrosia dumosa

Ambrosia salsola

Encelia actoni

Ericameria (Chrysothamnus) nauseosus

Tetradymia glabrata

Brassicaceae

**Brassica tournefortii*

Chenopodiaceae

**Salsola tragus*

Euphorbiaceae

Croton setigerus

Euphorbia micromeria

Fabaceae

Senegalia (Acacia) greggii

Geraneaceae

**Erodium cicutarium*

Polygonaceae

+*Eriogonum fasciculatum*

Eriogonum plumatella

Solanaceae

Lycium cooperi

Zygophyllaceae

GNETAE

Joint-fir family

Nevada joint-fir

DICOT FLOWERING PLANTS

Sunflower family

Annual bur-sage

Burrobush

Cheesebush

Acton encelia

Rubber rabbitbrush

Cottonthorn

Mustard family

Saharan mustard

Goosefoot family

Russian thistle

Spurge family

Croton

Prostrate spurge

Pea family

Catclaw acacia (PPS)

Geranium family

Red-stemmed filaree

Buckwheat family

California buckwheat

Yucca buckwheat

Nightshade family

Peach thorn

Caltrop family

Larrea tridentata
**Tribulus terrestris*

Creosote bush
Puncture vine

ANGIOSPERMAE: MONOCOTYLEDONES

MONOCOT FLOWERING PLANTS

Agavaceae
Yucca brevifolia

Agave family
Joshua tree (PPS)

Poaceae
**Cynodon dactylon*
**Schismus* sp.

Grass family
Bermuda grass
Split-grass

* - indicates a non-native (introduced) species.

c.f. - compares favorably to a given species when the actual species is unknown.

Some species may not have been detected because of the seasonal nature of their occurrence. Common names are taken from Beauchamp (1986), Hickman (1993), Jaeger (1969), and Munz (1974).

Appendix B. Animal Species Detected

The following animal species were detected during the general biological inventory described in this report. **Special status animal species are highlighted in red and signified by “(SSA)” following the common names.** Those only found in adjacent areas are signified by “+.”

AVES

Falconidae

Falco sparverius

Strigidae

Athene cunicularia

Columbidae

Columba livia

Alaudidae

Eremophila alpestris

Corvidae

Corvus corax

Fringillidae

Carpodacus mexicanus

MAMMALIA

Sciuridae

Otospermophilus beecheyi

Heteromyidae

Dipodomys sp.

Canidae

Canis latrans

Vulpes macrotis

BIRDS

Falcons

American kestrel

Typical owls

Burrowing owl (SSA)

Pigeons and doves

Rock dove

Larks

Horned lark

Crows and jays

Common raven

Finches

House finch

MAMMALS

Squirrels

California ground squirrel

Pocket mice

Kangaroo rat

Foxes, wolves, and coyotes

Coyote

Kit fox (SSA)

Nomenclature follows Stebbins, *A Field Guide to Western Reptiles and Amphibians* (2003), third edition; Sibley, National Audubon Society, the Sibley Guide to Birds (2000), first edition; and Ingles, *Mammals of the Pacific States* (1965), second edition.

Appendix C. Field Data Sheets Completed on 17 November 2022

The USFWS and County recommend that consultants include copies of field data from which the results and conclusions given in their reports are derived. As such, copies of the data sheets completed by Sharon Dougherty on 11/17/2022 follow.

Version: October 8, 2019

Date of survey: 17 Nov 2022 Survey biologist(s): S. Dougherty, S. Teed
(day, month, year) (name, email, and phone number)

Site description: APNS 328-531-B & 14 ATT Adelanto
(project name and size, general location)

County: San Bernardino Quad: Adelanto Location: 463150 / 3821966
(UTM coordinates, lat-long, and/or TRS, map datum)

Circle one: 100% coverage by Sampling Area size to be surveyed: 15,900 Transect #: 52 Transect length: 175m, 160m

GPS Start-point: 463150, 3821650 Start time: 08:00 am/pm
(easting, northing, elevation in meters)

GPS End-point: 463310, 3822140 End time: 1145 am/pm
(easting, northing, elevation in meters)

Start Temp: 47°F End Temp: _____ °C

Live Tortoises						
Detection number	GPS location		Time	Tortoise location <small>(in burrow: all of tortoise beneath plane of burrow opening, or not in burrow)</small>	Approx MCL ≥180 mm? <small>(Yes, No or Unknown)</small>	Existing tag # and color, if present
	Easting	Northing				
1						
2						
3						
4						
5						
6						
7						
8						

Tortoise Sign (burrows, scats, carcasses, etc)				
Detection number	GPS location		Type of sign <small>(burrows, scats, carcass, etc)</small>	Description and comments
	Easting	Northing		
1				
2				
3				
4				
5				
6				
7				
8				

22 of 22

Preparing for any action that may occur within the range of the Mojave desert tortoise (*Gopherus agassizii*)

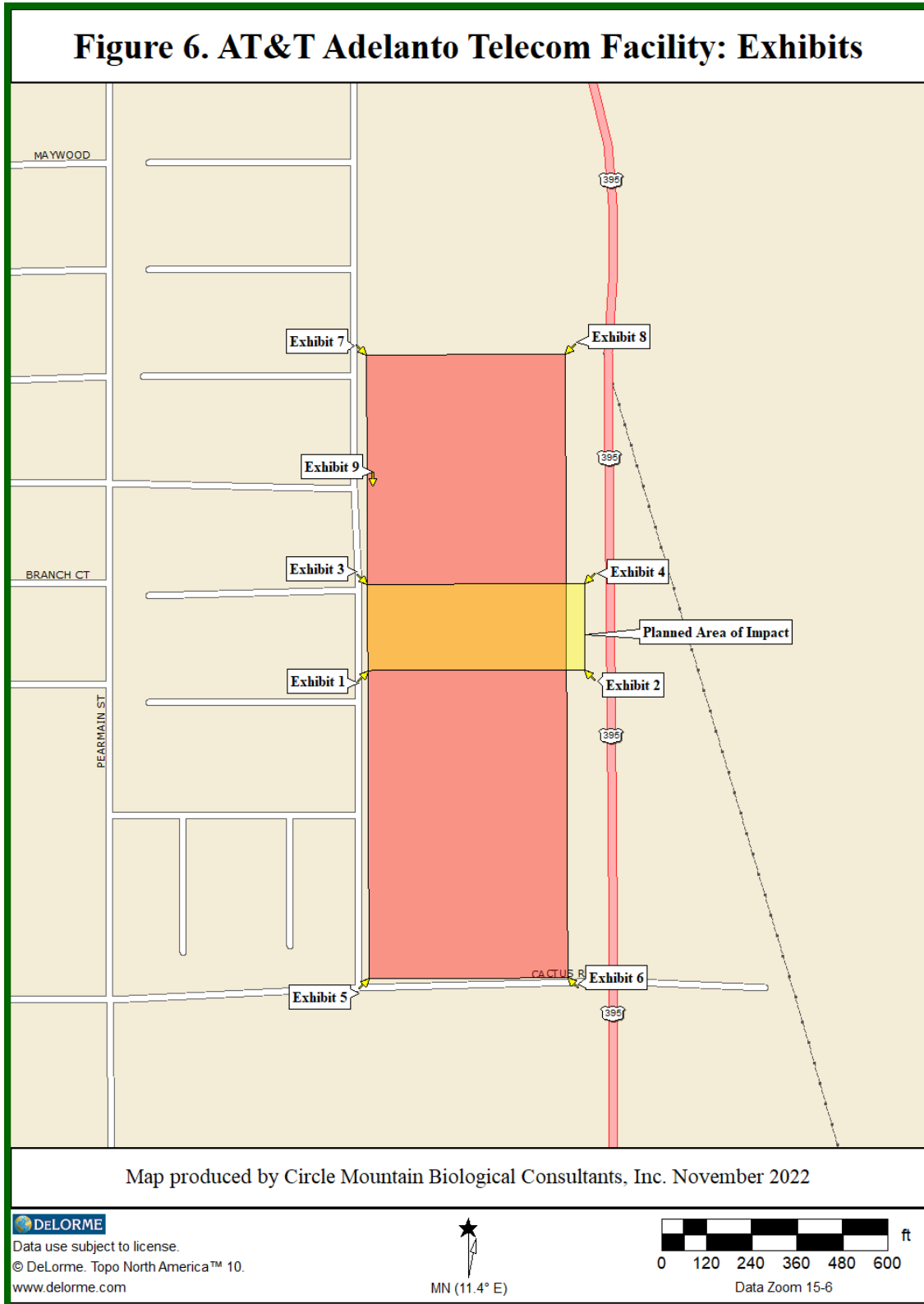
JOB#/NAME	DATE	DRIVE TIME		MILES	FIELD TIME		SURVEYORS		
ATTAdelanto 22-047	11-17-22	TO	FROM	55	BEGIN	END	SD, ST		
WEATHER CONDITIONS (Start/End)				UTM (NAD 83) (circle starting corner)					
TEMP: 47°F WIND X: 1 ↑ 2 NSEW CLOUD: 0%				NE→ NW→ SE→ SW→					
TEMP: °F WIND X: ↑ NSEW CLOUD: %				463310 -3150 -3310 -3150					
				3822150 -2150 -1650 -1650					
PLANT COMMUNITY		ANNUAL PLANTS			BIRDS		HERP	MAM	
Disturbed creosote/burro bush w/ Joshua trees		Ambaca				CORA		CACS	
		Saltra				HOFI		KRAT	
Lar tri	Yucora	Bromus	Era cic			ROBO		COYO	
Aca gre			Sch sp			HO LA		KEYC	
Ephraev			Cynda			AM KE			
Amba sal			Eri pla			BU OW			
Amba dum			Eup mic						
Lyc coe (dead)			Tri ter						
Civ nau			Brateu						
								Soils	
								Sandy loam	
								Photographs	
								1 SW→NE	
								2 SE→NW	
								3 mounds - 3154/1796	
								4 SW impact area - 3150/1960	
								5 SE impact area - 3325/1967	
								6 NE impact area - 3325/1966	
OBSERVABLE HUMAN DISTURBANCES									
T#	East	North	OHV	Road	Dog	Dump	S Gun	Rifle	Target
1	3150	1660	☒						7 NW - 3150/1966
3	3310	1680	☒						8 nonnative cacti
5	3150	1700	☒						9 BUOW - 3155/1954
7	3310	1720							10 NW → SE
9	3150	1740							
11	3310	1760				° gravel			
13	3150	1780				° veg			
15	3310	1800				° gravel			mounds in w. boundary
17	3150	1820							
19	3310	1840							
21	3150	1860							
23	3310	1880							
25	3150	1900							
27	3325	1920							
29	3150	1940							
31	3325	1960				° gravel			
33	3150	1980				° gravel ° asphalt			
35	3310	2000							
37	3150	2020							
39	3310	204							

☒ ☒ :
nonnative
324/195

impact
area

sw corner brushed JTs left
windblown trash throughout

Appendix D. Photographic Exhibits



Locations of the 9 photographic exhibits on the next 5 pages are depicted in Figure 6.



Exhibit 1. View of 3-acre Project Area from southwest corner facing northeast (see Figure 6 for locations and directions of photographs).



Exhibit 2. View of 3-acre Project Area from southeast corner facing northwest.



Exhibit 3. View of 3-acre Project Area from northwest corner facing southeast.



Exhibit 4. View of 3-acre Project Area from northeast corner facing southwest.



Exhibit 5. View from the southwest corner of the larger property, facing northeast.



Exhibit 6. View from the southeast corner of the larger property, facing northeast.



Exhibit 7. View from the northwest corner of the larger property, facing southeast.



Exhibit 8. View from the northeast corner of the larger property, facing southwest.



Exhibit 9. Non-native cactus dumped on property.

APPENDIX E. DATA FOR JOSHUA TREE OBSERVATIONS (NAD 83)

Condition = Poor, Moderate, and Good; Red = Within Planned Project Area

Condition	NO. TRUNKS (HEIGHTS)	EAST	NORTH	Condition	NO. TRUNKS (HEIGHTS)	EAST	NORTH
Good	1 (↑ 13')	463174	381682		(↑)		
Poor	1 (↑ 16')	463195	381702		(↑)		
Good	4 (1' ↑ 13')	463284	381701		(↑)		
Good	1 (↑ 6')	463199	381782		(↑)		
Moderate	1 (↑ 5.5')	463253	381778		(↑)		
Good	1 (↑ 2.5')	463292	381807		(↑)		
Poor	1 (↑ 1.5')	463226	381812		(↑)		
Good	1 (↑ 11')	463241	381827		(↑)		
Good	1 (↑ 3.5')	463191	381861		(↑)		
Good	1 (↑ 4')	463277	381875		(↑)		
Good	1 (↑ 4')	463233	381886		(↑)		
Moderate	1 (↑ 0.5')	463287	381908		(↑)		
Moderate	1 (↑ 2.5')	463261	381966		(↑)		
Good	1 (↑ 12')	463178	381968		(↑)		
Moderate	1 (↑ 3')	463277	381998		(↑)		
Good	1 (↑ 12')	463272	382016		(↑)		
Moderate	1 (↑ 2')	463232	382027		(↑)		
Good	2 (8' ↑ 9')	463229	382086		(↑)		
Good	1 (↑ 1.5')	463289	382106		(↑)		

SOURCE DOCUMENT 3

**Cultural Resources Assessment
December 21, 2022**

Cultural Resources Assessment

AT&T Mobility, LLC

Facility Number: CSL00199

Facility Name: Woosley

FA: 13014374
PACE: MRLOS015323
USID: 281535

Northwest Corner of Cactus Road and Highway 395
Adelanto, CA 92301
San Bernardino County

Prepared for:



8951 Windsor Parkway
Johnston, IA 50131

Prepared by:

Morgan Bender, M.A., RPA and Curt Duke M.A., RPA
Duke Cultural Resources Management, LLC
18 Technology Dr
Irvine, California 92618
(949) 356-6660
curt@dukecrm.com
www.dukecrm.com

Duke CRM Contract No.: C-0393



December 21, 2022

INTRODUCTION

Duke Cultural Resources Management, LLC (DUKE CRM) is under contract to Impact 7G and AT&T Mobility, LLC (AT&T) to perform a cultural resources assessment for AT&T facility CSL00199/Woosley, located at the northwest corner of Cactus Road and Highway 395, City of Adelanto, County of San Bernardino, California. This report has been prepared to comply with Section 106 of the National Historic Preservation Act (NHPA) and 36 CFR Part 800, the regulations implementing the NHPA. The Federal Communications Commission (FCC) is the lead Federal Agency for the purposes of Section 106.

Project Description

Based on the information provided to DUKE CRM and Impact 7G by AT&T, the proposed action consists of constructing a new 75 feet (ft.) tall Monoecalyptus within a 24 ft. 2-inch (in.) by 34 ft. 10 in. proposed lease area enclosed with a new 10 ft. 8 in. tall concrete masonry unit (CMU) wall with metal lid. Fifteen (15) new panel antennas, 36 radio units, and 6 surge suppressors will be installed and mounted close to the top of the new Monoecalyptus. One generator and one 10 ft. by 4 ft. concrete pad will be added in the new enclosure area. In addition, approximately 240 ft. of trenching will be excavated east toward Highway 395 for new power and Telco lines east toward Highway 395 (see Appendix A for Site Plans).

The area of potential effects (APE) for direct effects includes the location of the new Monoecalyptus, the proposed lease area, and the length of proposed underground trenching. The APE for indirect/visual effects is defined as ½ mile for all new towers that are 200 ft. or less in overall height. The overall height of the Monoecalyptus is 75 ft.; therefore, the APE for visual effects is ½ mile. See Appendix A for photographs of the facility and the surrounding area.

Project Location

The Project is located at the northwest corner of Cactus Road and Highway 395, City of Adelanto, County of San Bernardino, California (Appendix B). Latitude/longitude coordinates for the Project are 34° 32' 15.30" N, 117° 24' 01.14" W (NAD 83). Specifically, the Project is located in Section 9, Township 5 North, Range 5 West, San Bernardino Baseline and Meridian. The Project is depicted on the USGS *Adelanto, Calif.* 7.5-minute quadrangle (Appendix B).

SETTING

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. Lake Mojave (12000–7000 B.P.)
- II. Pinto (7000–4000 B.P.)
- III. Gypsum (4000–1500 B.P.)
- IV. Saratoga Springs (1500–800 B.P.)
- V. Shoshonean (800~200 B.P.)

Warren and Crabtree (1986) viewed cultural continuity and change in terms of various significant environmental shifts, defining the cultural ecological approach for archaeological research of the California deserts. Many changes in settlement pattern and subsistence focus are viewed as cultural adaptations to a changing environment, beginning with the gradual environmental warming in the late Pleistocene, the desiccation of the desert lakes during the early Holocene, the short return to pluvial conditions during the middle Holocene, and the general warming and drying trend, with periodic reversals, which continues to this day.

The project is located within the boundaries of 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 Victorville were named separately as *Pat' Kaitis* (Mountain Sheep Mountains). The Serrano spoke a dialect of the Takic subset of the large Uto-Aztecan languages group. 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).

In California, the historic era is generally divided into three periods: the Spanish or Mission Period (1769 to 1821), the Mexican or Rancho Period (1821 to 1848), and the American Period (1848 to present). The first Europeans to encounter coastal California were the party of Portuguese explorer Juan Rodriguez Cabrillo, who claimed it for Spain in 1542. The first Europeans in the area were led by Captain Gaspar de Portolá, Spain's first military governor of California in 1769 (Rolle 1963).

Spanish contact within the vicinity of the Project area did not occur until the 1770s, when the Spanish Franciscan friar, Francisco Garcés, traversed the Mojave Desert into coastal southern California through present day Cajon Pass (Walker 1986). The Project area is not historically within a Mexican land grant; however, the area was used ostensibly for cattle ranching and agriculture.

Adelanto was founded by E.H. Richardson, the inventor of the Hotpoint Electric Iron in 1915. He used the money made from selling his patent to develop one of the first master planned communities in southern California. Richardson divided the land into 1-acre plots, which he hoped to sell to World War I veterans. By World War II the Victorville Army Air Field, later named George Air Force Base, was established within the Adelanto community. Adelanto continued as a community service district until 1970 when the city was incorporated, becoming San Bernardino's smallest city (Rolle 1963).

METHODS

Research

DUKE CRM conducted a records search for cultural resources (archaeological and historical) at the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton.

This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources surveys and excavation reports generated from projects located within ½ mile of the proposed Project. In addition, a review was conducted of the Built Environment Resources Directory (BERD), which includes the National Register of Historic Places (NRHP), California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest.

Field Survey

A pedestrian field survey was conducted of the Project APE for direct effects on December 2, 2022.

Personnel

The field survey was completed by Zachary Duke, Field Crew at, at DUKE CRM. Portions of the report were completed by Morgan Bender, M.A., (Registered Professional Archaeologist (RPA), Archaeologist at DUKE CRM. Curt Duke, M.A., RPA supervised and reviewed these work efforts. Mr. Duke is the Principal Archaeologist of DUKE CRM. Mr. Duke meets the professional qualifications of the Secretary of the Interior for prehistoric and historical archaeology and has 27 years of experience. Mr. Duke is an RPA who has worked in all phases of archaeology (archival research, field survey, testing and data recovery excavation, laboratory analysis, and construction monitoring). Please see Appendix C for Mr. Duke’s resume.

RESULTS

Research

The records search was conducted on November 15, 2022. The SCCIC identified three (3) historic resources within ½ mile of the Project (see Table 1 below). Of these resources, the Southern California Edison (SCE) Bishop Creek to San Bernardino Tower Line is the closest, located approximately 530 ft. east of the Project. The Tower Line was constructed from 1911-1913 and is listed in the NR as eligible (2S2) in 2021. Additionally, the SCCIC identified eleven (11) cultural resource studies within ½ mile of the Project. Of these reports, none covered the Project area.

Table 1. Cultural Resources within ½ mile of Project

Resource No.	Resource Type	Description	NRHP Eligible	Distance (ft.) and Direction
P-36-004018	Historic	Refuse Deposit	Unknown	645 east
P-36-004203	Historic Built Environment	SCE Bishop Creek to San Bernardino Tower Line	2S2	530 east
P-36-023318	Historic	One solder-dot metal can	Unknow	810 north

2S2: Individually determined eligible for NR by consensus through Section 106 process. Listed in the CR.

A review of the San Bernardino County BERD indicates that the property located at the northwest corner of Cactus Road and Highway 395 has not been previously evaluated for the NRHP. The BERD was accessed on December 6, 2022.

Field Survey

The current field survey did not identify any cultural resources within the direct APE. The ground in the area consists of exposed sediment and small scattered bushes. Ground surface visibility is excellent, ranging from 80 to 100 percent, with exposed sediment consisting of a light brown silty loam. The surrounding area is predominantly commercial properties, residential properties, Highway 395, and undeveloped land. The surrounding setting is a mix of natural habitat and modern

residential tracts; it does not appear to be historic. Photographs of project area are included in Appendix A.

IMPACTS ASSESSMENT

The records search and field survey identified three cultural resources within the indirect APE for AT&T facility CSL0199/Woosley. The nearest cultural resource (P-36-004203) is the SCE Bishop Creek to San Bernardino Tower Line, located 530 ft. east of the Project. The proposed ground disturbance will be approximately 240 ft. of trenching to the east. Therefore, there is limited to no potential for direct or indirect impacts to the Tower Line or the other two historic resources recorded nearby.

AT&T facility CSL0199/Woosley will not have any direct or indirect impacts to any historic properties. This leads to a finding of *no historic properties affected* for facility CSL0199. No recommendations are made for further cultural resource efforts. If the Project description changes additional studies may be warranted.

In the event that remnants from an archaeological site are discovered during ground disturbing activities, all work shall halt temporarily until a qualified archaeologist can be retained by the Project proponent to assess the significance of the find. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of the origin and disposition of the remains pursuant to State Public Resources Code Section 5097.98. The County Coroner must be notified immediately.

CERTIFICATION: I hereby certify that the statements furnished above and in the attached exhibits are accurate, true, and correct to the best of my knowledge and belief.

DATE: December 21, 2022

SIGNED:  _____

PRINTED NAME: Curt D. Duke

REFERENCES

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Appendix A

Site Plans and Photographs



AT&T MOBILITY

SITE NUMBER: CSL00199

SITE NAME: WOOLSEY

PACE: #MRLOS015323 | FA: #13014374 | USID: #281535

A/E DOCUMENT REVIEW STATUS

Table with columns for Status Code, Review Status (Accepted, Not Accepted, Review not required), and Date.

Main drawing content table with columns: DRAWING INDEX (ZONING), REV., DIRECTIONS, PROJECT INFORMATION, VICINITY MAP, CODE COMPLIANCE, and SITE QUALIFICATION PARTICIPANTS.

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

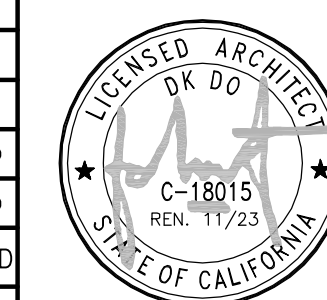
CSL00199 WOOLSEY PACE: #MRLOS015323 | FA: #13014374 | USID: #281535

NW OF CACTUS ROAD HWY 395 ADELANTO, CA 92301



1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780

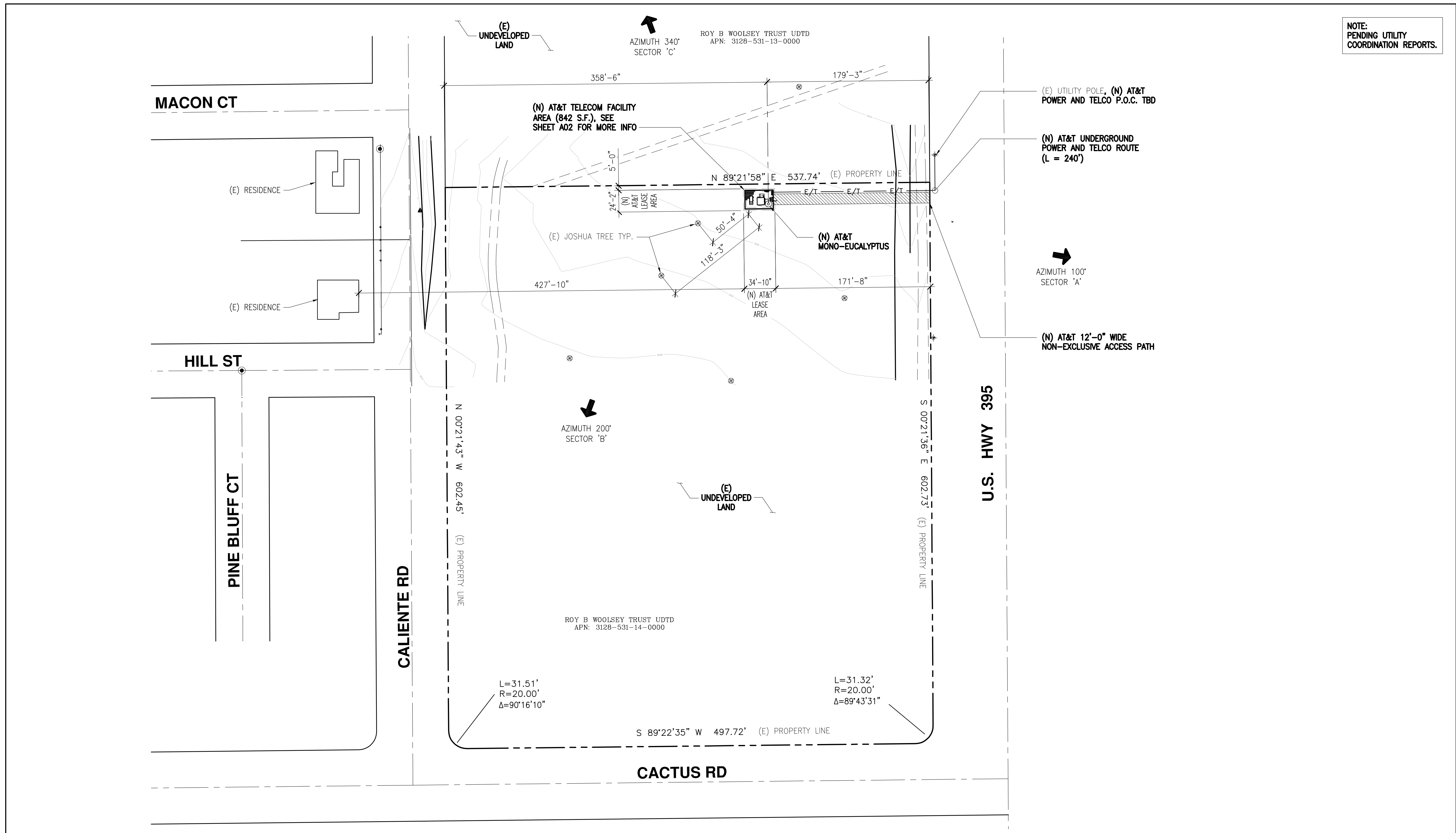
Revision table with columns: NO., DATE, REVISIONS, BY, CHK, APP'D.



Project information table including AT&T MOBILITY TUSTIN, CA, TITLE SHEET, JOB NO, DRAWING NUMBER, and REV.

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NOTE:
 PENDING UTILITY
 COORDINATION REPORTS.

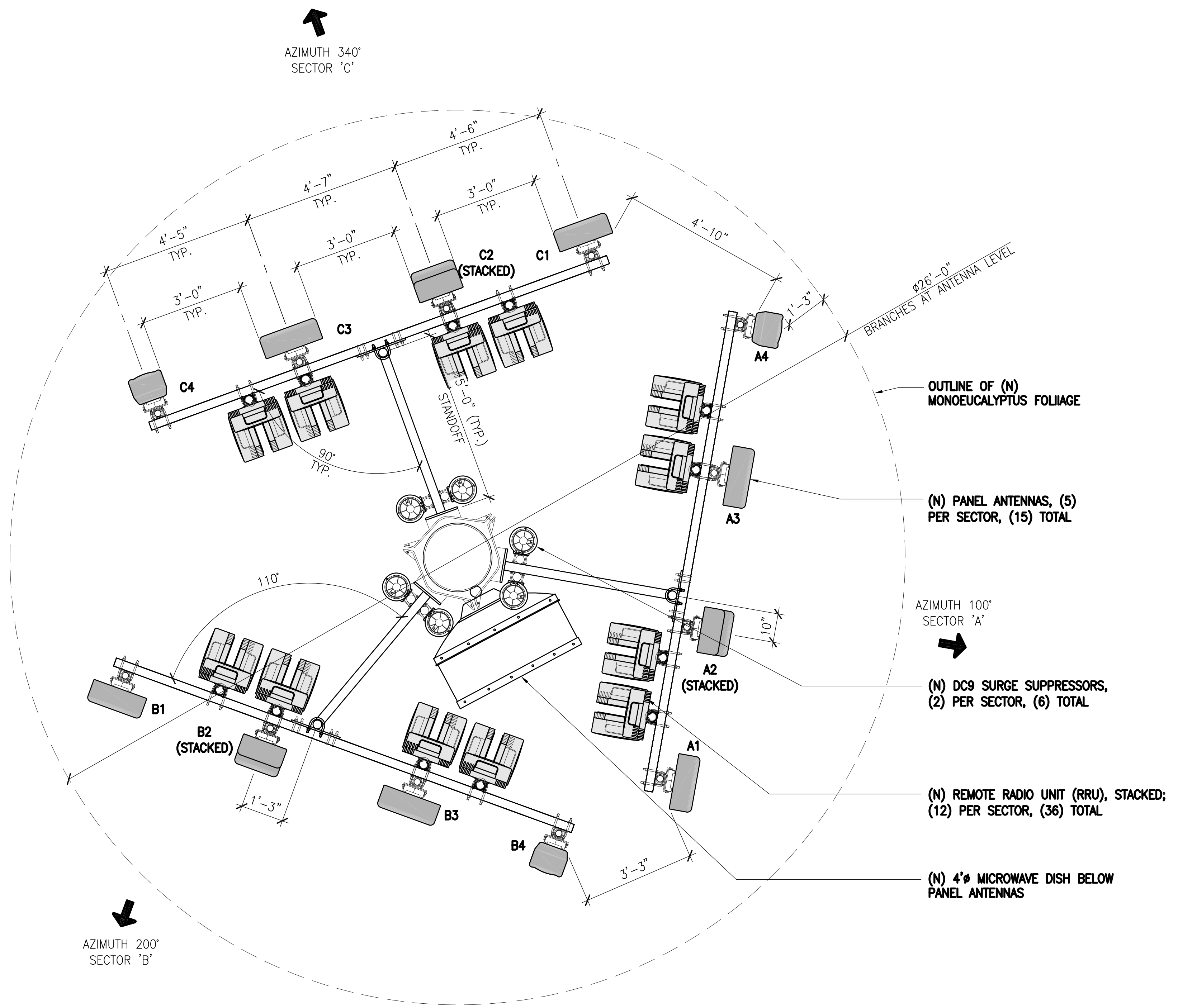


SITE PLAN		SCALE: 1"=50'-0"	1																																		
DCI PACIFIC A E C WORKS <small>ARCHITECTURE ENGINEERING CONSULTING 26 EXECUTIVE PARK SUITE 170 IRVINE CA 92614</small>	CSL00199 WOOLSEY PACE: #MRLOS015323 FA: #13014374 USID: #281535 NW OF CACTUS ROAD HWY 395 ADELANTO, CA 92301	 <small>1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780</small>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;">NO.</td> <td style="width: 15%;">DATE</td> <td style="width: 45%;">REVISIONS</td> <td style="width: 10%;">BY</td> <td style="width: 10%;">CHK</td> <td style="width: 15%;">APP'D</td> </tr> <tr> <td>0</td> <td>08/19/22</td> <td>ISSUED FOR ZONING PERMIT</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> <tr> <td>A</td> <td>07/25/22</td> <td>ISSUED FOR ZD REVIEW AND COMMENTS</td> <td>RF</td> <td>BOK</td> <td>DKD</td> </tr> <tr> <td colspan="6" style="text-align: center;">SCALE AS SHOWN DESIGNED DRAWN</td> </tr> </table> <div style="text-align: right; margin-top: 10px;"> </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td colspan="2" style="text-align: center;">AT&T MOBILITY TUSTIN, CA</td> </tr> <tr> <td colspan="2" style="text-align: center;">SITE PLAN</td> </tr> <tr> <td style="width: 50%; text-align: center;">JOB NO</td> <td style="width: 50%; text-align: center;">DRAWING NUMBER</td> </tr> <tr> <td style="text-align: center;"> </td> <td style="text-align: center;">AA-CSL00199-A01</td> </tr> <tr> <td style="text-align: center;">REV.</td> <td style="text-align: center;">0</td> </tr> </table>	NO.	DATE	REVISIONS	BY	CHK	APP'D	0	08/19/22	ISSUED FOR ZONING PERMIT	RF	BOK	DKD	A	07/25/22	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD	SCALE AS SHOWN DESIGNED DRAWN						AT&T MOBILITY TUSTIN, CA		SITE PLAN		JOB NO	DRAWING NUMBER		AA-CSL00199-A01	REV.	0
NO.	DATE	REVISIONS	BY	CHK	APP'D																																
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CSL00199 ANTENNA & RRU SCHEDULE																			
SECTOR	POSITION	ANTENNAS / MW DISH				REMOTE RADIO UNITS (RRU'S)				FIBER TRUNKS			DC TRUNKS		JUMPERS		MW DISH CABLES (EW 90)		
		MFR.	MODEL NO.	AZIMUTH	RAD CENTER	MODEL NO.	QTY	UP OR DOWN	QTY	LENGTH	DIA	QTY	LENGTH	DIA	LENGTH	DIA	QTY	LENGTH	DIA
ALPHA	A1	COMMSCOPE	NNH4-65C-R6-V3	100	70'-0"	RRUS 4449 B5/B12	12	UP	2	100'	2"	6	100'	2"	<12'	1/2"	N/A	N/A	N/A
					RRUS 8843 B2/B66A	<12'									1/2"				
	A2	ERICSSON	AIR6419 B77G	100	72'-9"	N/A									<12'	1/2"			
			AIR6449 B77D	100	69'-2"	N/A									<12'	1/2"			
A3	CCI	OPA65R-BU8DA-K	100	70'-0"	RRUS 4478 B14	<12'	1/2"												
A4	QUINTEL	QUINTEL QS8658-3e	100	70'-0"	RRUS 2012 B29	<12'	1/2"												
					RRUS 4415 B30	<12'	1/2"												
BETA	B1	COMMSCOPE	NNH4-65C-R6-V3	200	70'-0"	RRUS 4449 B5/B12	12	UP	2	100'	2"	6	100'	2"	<12'	1/2"	N/A	N/A	N/A
					RRUS 8843 B2/B66A	<12'									1/2"				
	B2	ERICSSON	AIR6419 B77G	200	72'-9"	N/A									<12'	1/2"			
			AIR6449 B77D	200	69'-2"	N/A									<12'	1/2"			
B3	CCI	OPA65R-BU8DA-K	200	70'-0"	RRUS 4478 B14	<12'	1/2"												
B4	QUINTEL	QUINTEL QS8658-3e	200	70'-0"	RRUS 2012 B29	<12'	1/2"												
					RRUS 4415 B30	<12'	1/2"												
GAMMA	C1	COMMSCOPE	NNH4-65C-R6-V3	340	70'-0"	RRUS 4449 B5/B12	12	UP	2	100'	2"	6	100'	2"	<12'	1/2"	N/A	N/A	N/A
					RRUS 8843 B2/B66A	<12'									1/2"				
	C2	ERICSSON	AIR6419 B77G	340	72'-9"	N/A									<12'	1/2"			
			AIR6449 B77D	340	69'-2"	N/A									<12'	1/2"			
C3	CCI	OPA65R-BU8DA-K	340	70'-0"	RRUS 4478 B14	<12'	1/2"												
C4	QUINTEL	QUINTEL QS8658-3e	340	70'-0"	RRUS 2012 B29	<12'	1/2"												
					RRUS 4415 B30	<12'	1/2"												
N/A		MW DISH	4'-0" DIAMETER	TBD	61'-0"											2	80'	TBD	

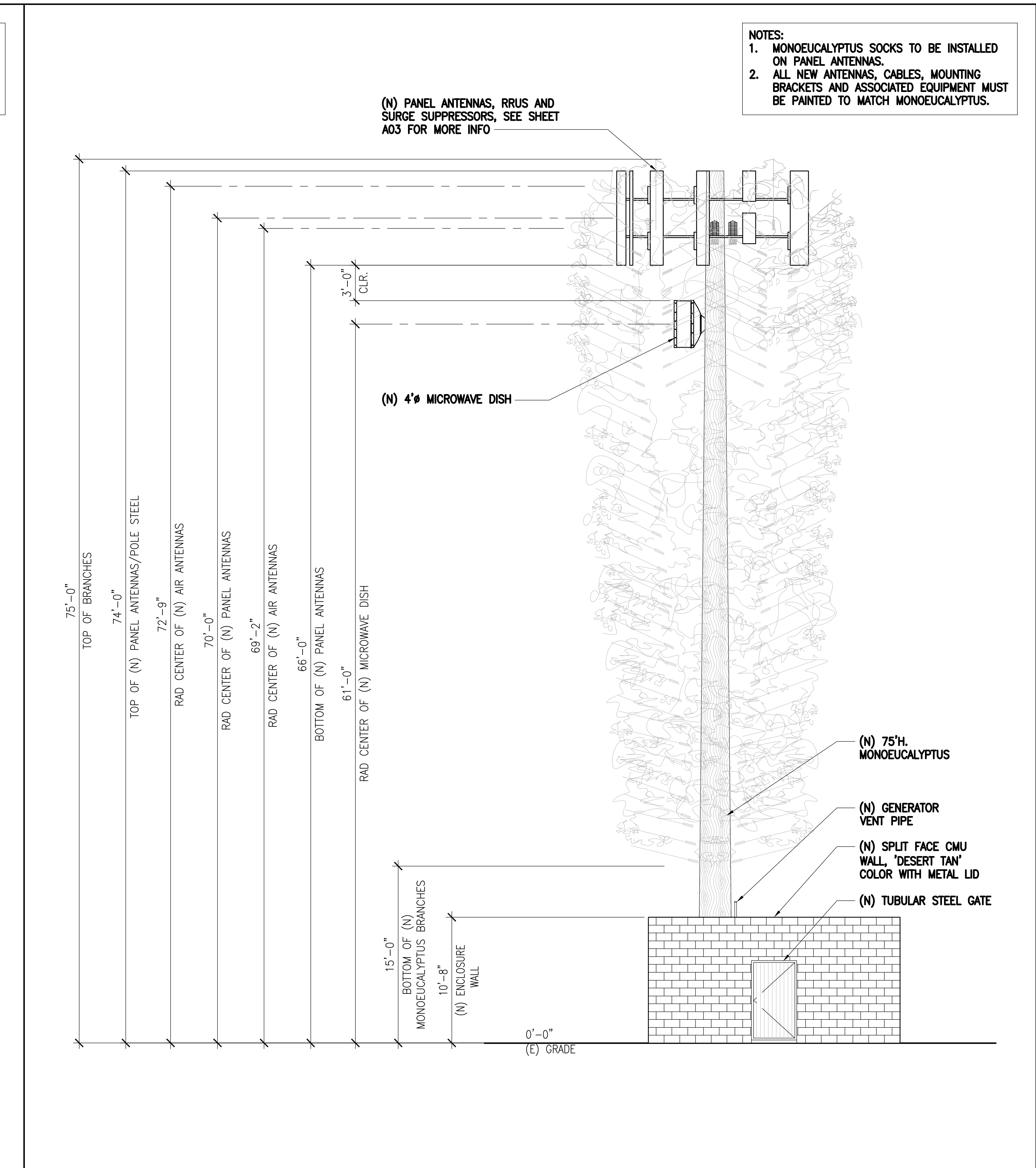
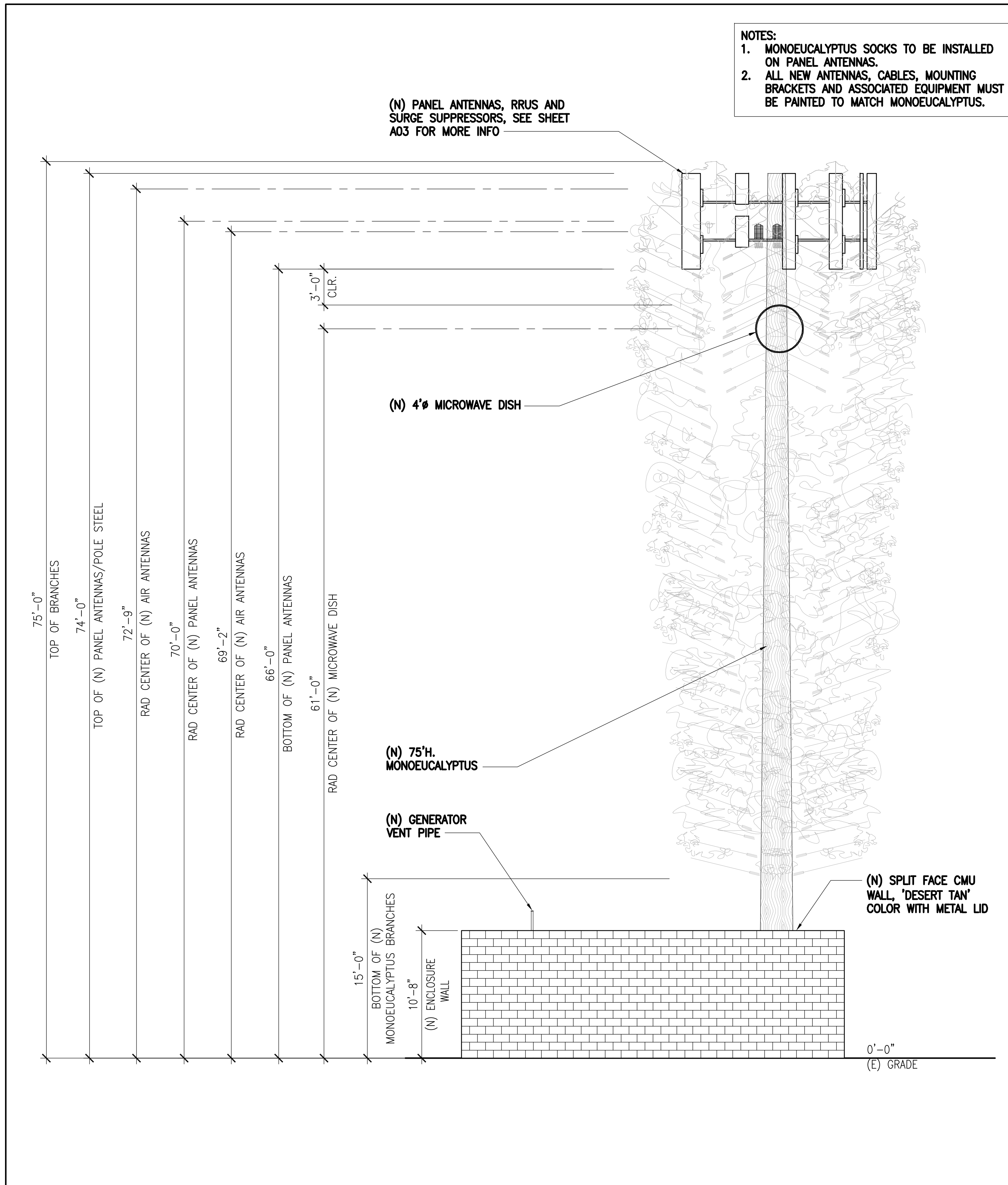
- NOTES:**
1. MONOEUCLYPTUS SOCKS TO BE INSTALLED ON PANEL ANTENNAS.
 2. ALL NEW ANTENNAS, CABLES, MOUNTING BRACKETS AND ASSOCIATED EQUIPMENT MUST BE PAINTED TO MATCH MONOEUCLYPTUS.



ANTENNA LAYOUT PLAN AND SCHEDULE

<p>ARCHITECTURE ENGINEERING CONSULTING 26 EXECUTIVE PARK SUITE 170 IRVINE CA 92614</p>	<p>CSL00199 WOOLSEY PACE: #MRLOS015323 FA: #13014374 USID: #281535</p> <p>NW OF CACTUS ROAD HWY 395 ADELANTO, CA 92301</p>	<p>1452 EDINGER AVENUE, 3RD FLOOR TUSTIN, CA 92780</p>	<p>0 08/19/22 ISSUED FOR ZONING PERMIT RF BOK DKD</p> <p>A 07/25/22 ISSUED FOR ZD REVIEW AND COMMENTS RF BOK DKD</p>	<p>NO. DATE REVISIONS BY CHK APP'D</p>	<p>SCALE AS SHOWN DESIGNED DRAWN</p>		<p>AT&T MOBILITY TUSTIN, CA</p> <p>ANTENNA LAYOUT PLAN, AND SCHEDULE</p>	<p>JOB NO. DRAWING NUMBER REV.</p> <p>AA-CSL00199-A03 0</p>
			<p>SCALE: 1/2"=1'-0" 1</p>		<p>SCALE: 1/2"=1'-0" 1</p>			

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SOUTH ELEVATION

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

EAST ELEVATION

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

DCI PACIFIC
A|E|C WORKS

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

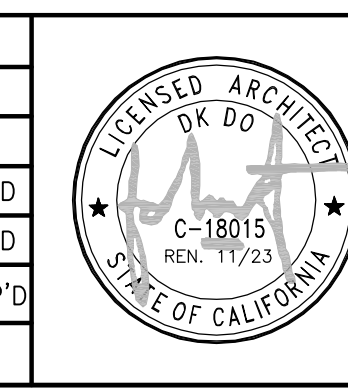
CSL00199
WOOLSEY
PACE: #MRLOS015323 | FA: #13014374 | USID: #281535

NW OF CACTUS ROAD HWY 395
ADELANTO, CA 92301

1452 EDINGER AVENUE, 3RD FLOOR
TUSTIN, CA 92780

NO.	DATE	REVISIONS	BY	CHK	APP'D
0	08/19/22	ISSUED FOR ZONING PERMIT	RF	BOK	DKD
A	07/25/22	ISSUED FOR ZD REVIEW AND COMMENTS	RF	BOK	DKD

SCALE AS SHOWN DESIGNED DRAWN



AT&T MOBILITY
TUSTIN, CA

ELEVATIONS

JOB NO	DRAWING NUMBER	REV.
	AA-CSL00199-A04	0

OWNER'S NAME: ROY B WOOLSEY TRUST UDTD
 ASSESSOR'S PARCEL NUMBER(S) 3128-531-14-0000

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.

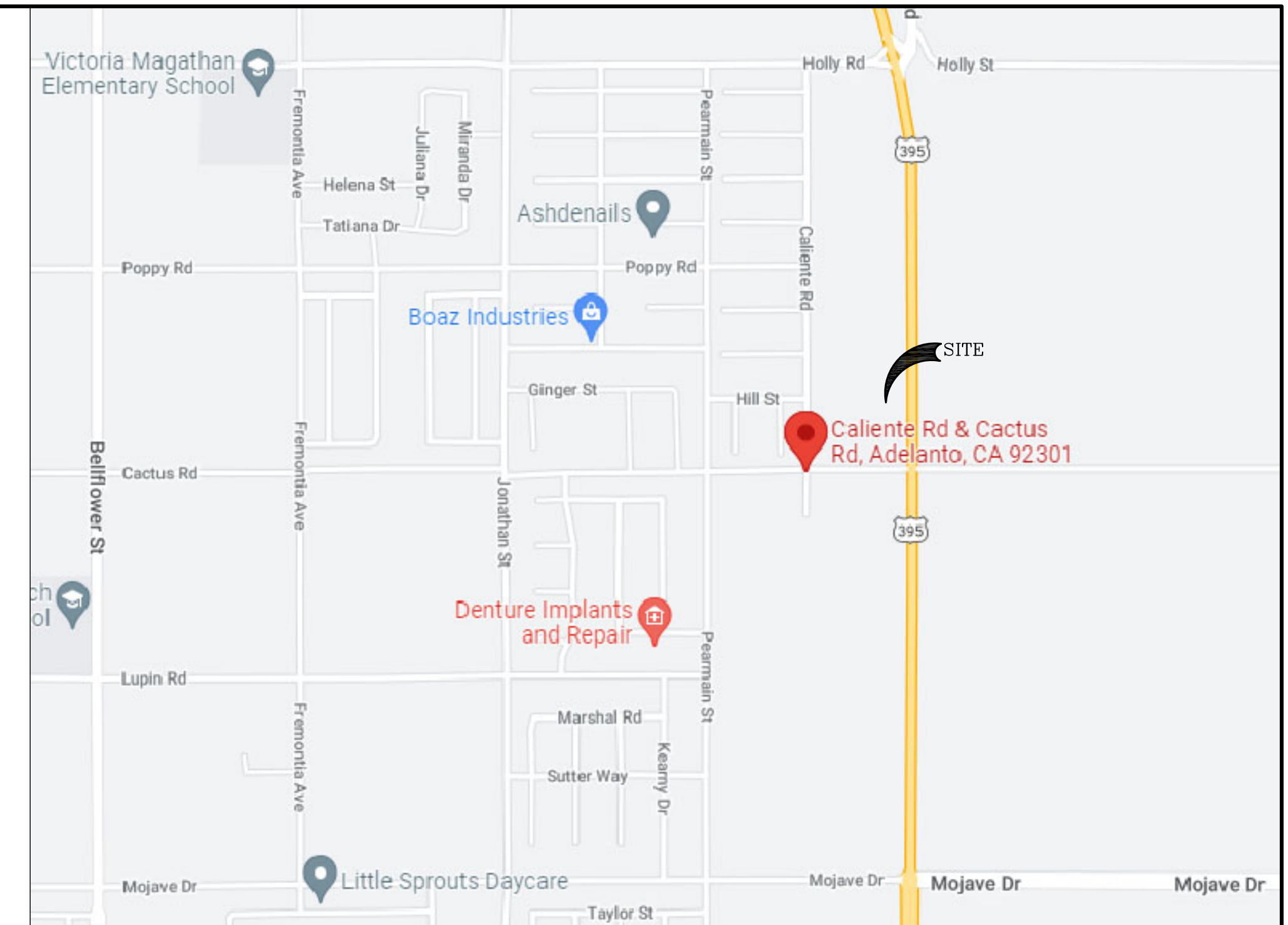
BASIS OF ELEVATIONS: NAVD 1988
 ELEVATIONS ARE BASED ON GPS OBSERVATIONS FROM TWO NATIONAL GEODETIC SURVEY C.O.R.S. REFERENCE STATIONS: 1) JPLM, ELEVATION = 1503.49' AND 2) TORP, ELEVATION = 103.77' WITH GEOID 2012 CORRECTIONS APPLIED.

SITE BENCHMARK IS A TAG FOUND IN THE TOP OF CURB, LOCATED AT THE SW INTERSECTION OF CALIENTE ROAD AND MACON COURT, AS SHOWN HEREON. ELEVATION = 3008.03'

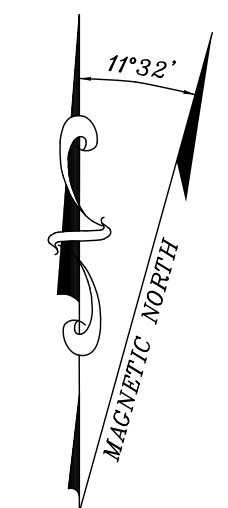
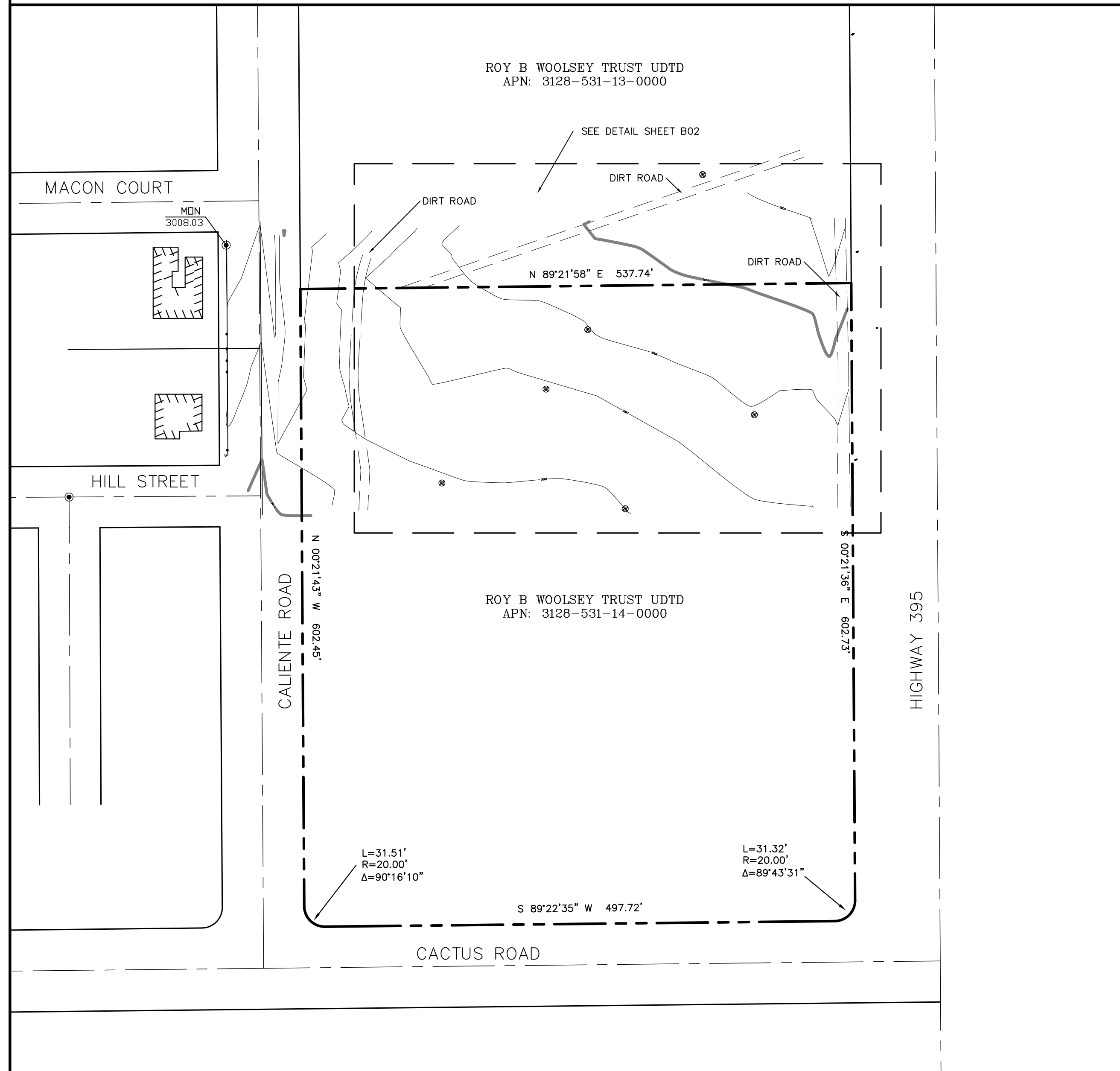
FEMA FLOOD ZONE DESIGNATION: National Flood Insurance Program:

County: SAN BERNARDINO
 Map/Panel: 06071C5795H
 Effective Date: 8/28/2008

The Flood Zone Designation for this site is: ZONE: "D"



VICINITY MAP

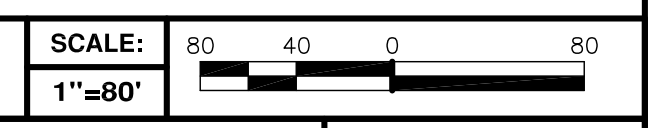


LEGEND

- ⊕ FIRE HYDRANT
- MONUMENT FOUND
- ⊗ TREE JOSHUA
- ⚡ UTILITY POLE
- EP EDGE OF PAVEMENT
- ER EDGE OF DIRT ROAD
- FL FLOWLINE CURB & GUTTER
- LIP LIP OF GUTTER
- NG GROUND SPOT ELEVATION
- TC TOP OF CURB
- BOUNDARY LINE
- - - CENTER LINE
- MISC. PROPERTY LINE
- - - MISC. TIE LINE
- RIGHT-OF-WAY LINE
- - - EASEMENT LINE
- X - FENCE LINE
- ////// BUILDING EDGE
- OHP 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 July 18, 2022

OVERALL SITE PLAN



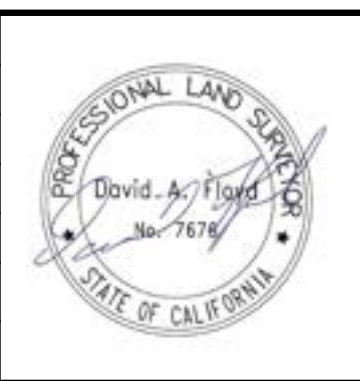
FLOYD SURVEYING
 34006 GALLERON STREET
 TEMECULA, CA 92592
 OFFICE: (949) 200-0626
 EMAIL: fsi@floydsurveying.com

DCI PACIFIC
 A|E|C WORKS
 ARCHITECTURE | ENGINEERING | CONSULTING
 26 EXECUTIVE PARK | SUITE 170 | IRVINE | CA 92614
 T 949.475.1000 | 949.475.1001 F

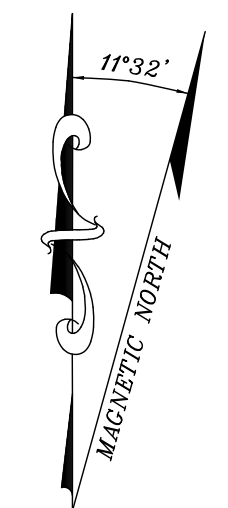
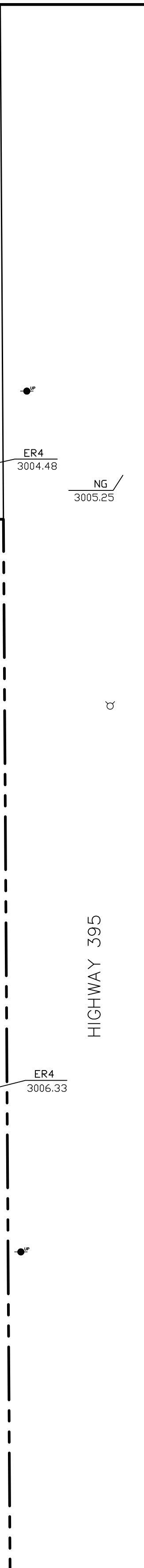
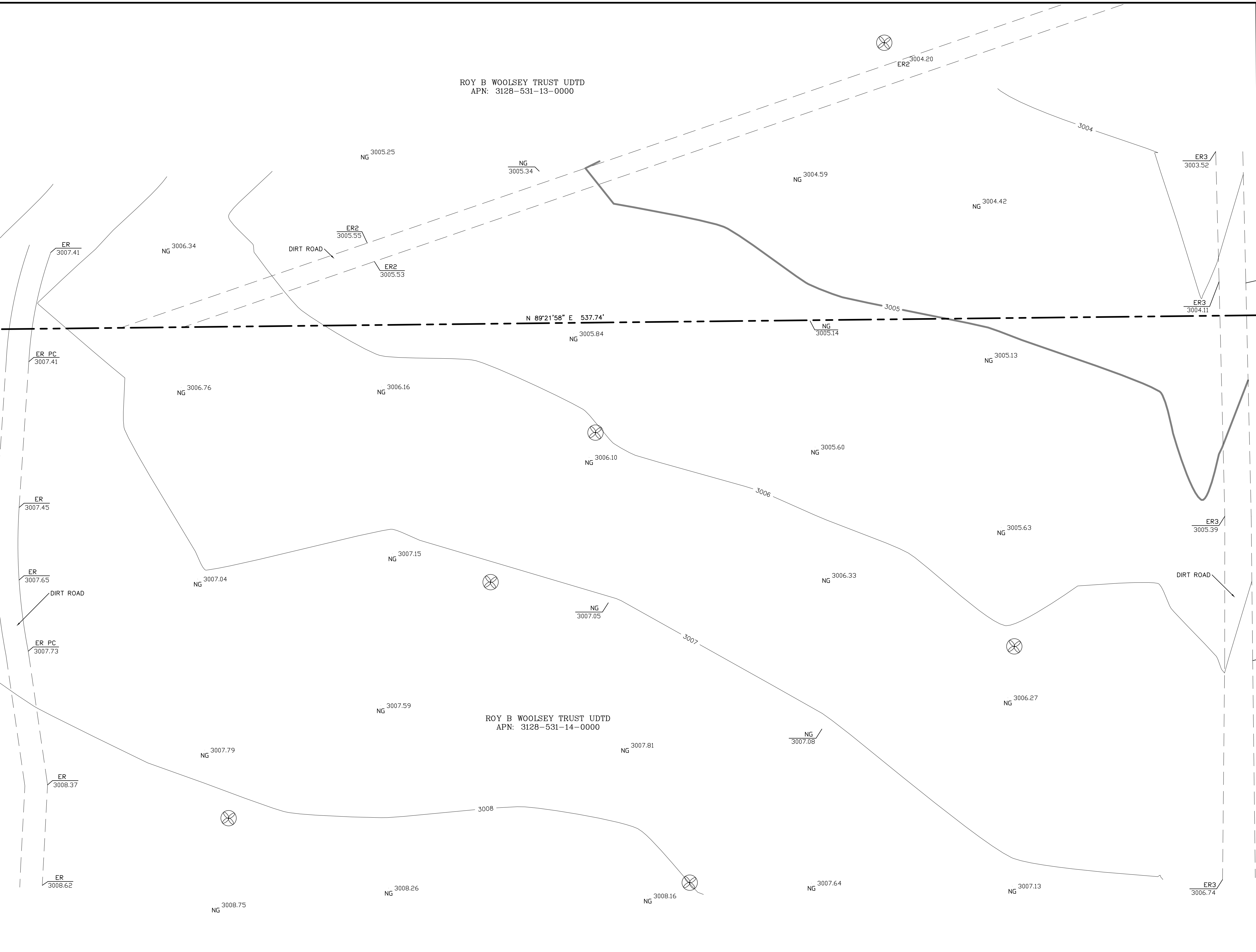
CSL00199
 NW OF CACTUS ROAD HWY 395
 ADELANTO, CA 92301

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

NO.	DATE	REVISIONS	BY	CHK	APP'D
0	7/21/22	ISSUED FOR ZONING SUBMITTAL	DAF	DAF	DAF
SCALE		AS SHOWN	DESIGNED	DRAWN	



SHEET TITLE: **TOPOGRAPHIC SURVEY**
 SHEET NUMBER: **B01**



LEGEND

- α FIRE HYDRANT
- MONUMENT FOUND
- ⊗ TREE JOSHUA
- UTILITY POLE
- EP EDGE OF PAVEMENT
- ER EDGE OF DIRT ROAD
- FL FLOWLINE CURB & GUTTER
- LIP LIP OF GUTTER
- NG GROUND SPOT ELEVATION
- TC TOP OF CURB
- BOUNDARY LINE
- - - CENTER LINE
- MISC. PROPERTY LINE
- - - MISC. TIE LINE
- RIGHT-OF-WAY LINE
- - - EASEMENT LINE
- X - FENCE LINE
- ||||| BUILDING EDGE
- [HP] — 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.
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- 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 July 18, 2022

DETAIL SITE PLAN SCALE: 1"=20'

FLOYD SURVEYING
 34006 GALLERON STREET
 TEMECULA, CA 92592
 OFFICE: (949) 200-0626
 EMAIL: fsi@floydsurveying.com

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NO.	DATE	REVISIONS	BY	CHK	APP'D
0	7/21/22	ISSUED FOR ZONING SUBMITTAL	DAF	DAF	DAF
SCALE AS SHOWN		DESIGNED	DRAWN		



SHEET TITLE		SHEET NUMBER
TOPOGRAPHIC SURVEY		B02



Site overview. View to south. Arrow points to proposed Monoecalyptus location.



Site overview. View to west.



Site overview. View to north.



Site overview. View to northwest.



Site overview. View to west. Arrow points to proposed Monoecalyptus location.



Site overview. View to northwest.



Site overview. View to south.



Closeup of exposed sediment. Plan view.



Location of 240 ft. of power and Telco trenching. View to east.
Blue line represents trenching location.



Overview of surroundings. View to east



Overview of surroundings. View to east.



Overview of surroundings. View to southeast.

Appendix B

Maps

- 1- USGS 7.5' Quadrangle
- 2- Street Map & Aerial Photograph

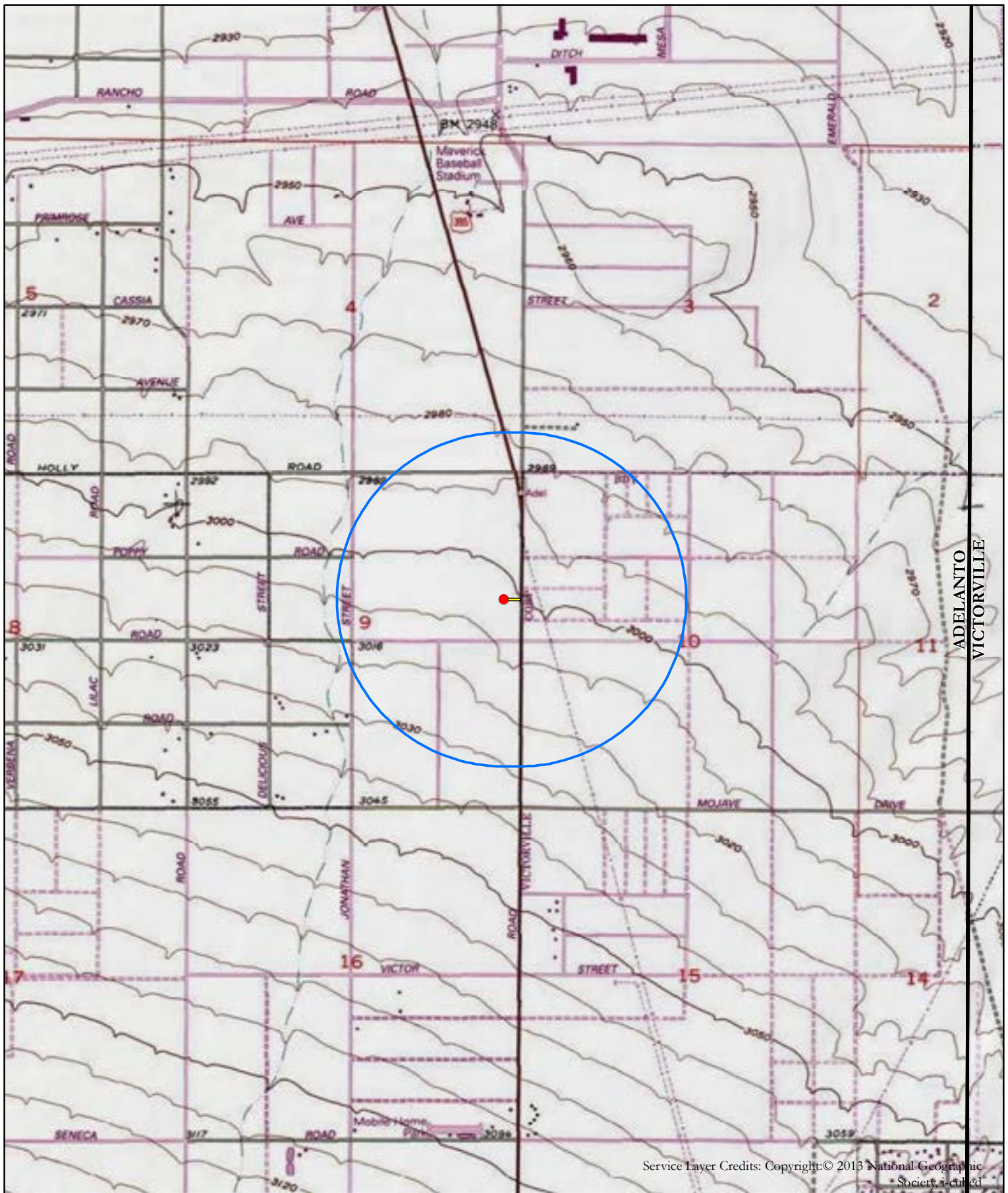


Figure 1. Project Location Map

Project - CSL00199
AT&T

Adelanto, Calif. USGS 7.5-minute quadrangle
T5N, R5W, Section 9

- CSL00199
- 1/2 Mile Radius
- CSL00199 Trench
- USGS 7.5' Quadrangles

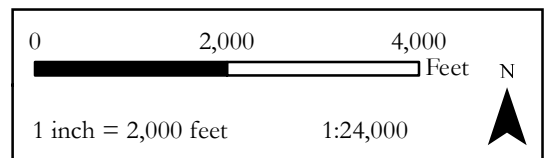


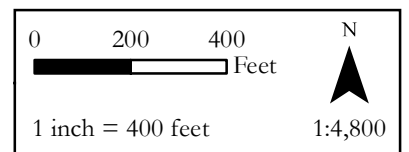


Figure 2. Street and Aerial Map

Project - CSL00199
AT&T



- CSL00199
- CSL00199 Trench



Appendix C

Resume

Curt Duke

President/Principal Archaeologist



Expertise

Cultural Resources Management
California Prehistory
Section 106 Compliance
CEQA Compliance
Native American Consultation

Education

CSU, Fullerton, M.A., Anth, 2006
SDSU, Grad Studies, Anth, 1996-97
UC Santa Cruz, B.A., Anth, 1994

Professional Registrations

RPA, No. 15969
County of Riverside (No. 151)
County of Orange

Professional Memberships

Society for California Archaeology
Society for American Archaeology
Pacific Coast Archaeological Society
Assoc. of Environmental Professionals
Building Industry Association

Professional Experience

President/Principal Archaeologist, DUKE CRM, March 2011 to present
Archaeologist/Principal, LSA Associates, 1997-2011
Archaeological/Paleontological Technician, Various Companies, 1995-97
Archaeological Technician/Teachers Assistant, Cabrillo College, 1994
Anthropological Laboratory Technician, UC Santa Cruz, 1994

Selected Project Experience

Reid/Baldwin Adobe, LA Arboretum, Arcadia, 2019-Present
Veteran Affairs Medical Clinic, Santa Rosa, 2019
Deane Dana Friendship Park, Rancho Palos Verdes, 2019
Makayla Mine Expansion Project, Olancho, 2019
Sweeny Road, Lompoc, 2018
Vantage Point Church, Eastvale, 2016 and 2018
VA West Los Angeles Campus Master Plan, 2017-Present
Avenue S-8 and 40th St. E. Roundabout, Palmdale, 2017-18
SR-110 Improvements, Los Angeles, 2017
Diamond Valley Estates Specific Plan, Hemet, 2017
VA West Los Angeles Campus Hospital Replacement, 2016-Present
Shoemaker Bridge Replacement, Long Beach, 2016-Present
Spruce Goose Hangar, Playa Vista, 2016
Rice Avenue at 5th Street Grade Separation, Oxnard, 2015-Present
Vila Borba, Chino Hills, 2013-Present
Skyridge Residential, Mission Viejo, 2011-Present
Baker Water Treatment Plant, Lake Forest, 2014-2015
VA Clinic, Loma Linda, 2014-Present
Evanston Inn, Pasadena, 2014-2016
Petersen Ranch, Leona Valley, 2013-2014
California Street/Highway 101, Ventura, 2014-Present
6th Street Bridge Replacement, Los Angeles, 2013-Present
I-15/I-215 IC Project, Devore, 2008-10
Colton Crossing Rail-to-Rail Grade Separation, 2008-11
City of LA DPW BOE, On-Call, Cultural/Paleo Services, 2008-11
Mid County Parkway, Riverside County, 2014-10
McSweeny Farms Specific Plan, Hemet, 2004-08
Mesquite Regional Landfill, Coachella Valley, 2006-08
Hacienda at Fairview Valley Specific Plan, Apple Valley 2007-08
Majestic Hills Specific Plan, Hesperia, 2006-07
Chuckwalla Solar I Project, Desert Center, 2007-08
Needles Highway Improvement Project, 2004-06
Superstition Solar I Project, Salton Sea, Imperial County, 2008
Muddy Canyon Archaeological Project, Newport Beach, 1997-2001
Temecula 32, Archaeological Phase II Testing, 2007
Mammoth Lakes Parks/Rec and Trail System Master Plan, 2010
24th Street Improvements, City of Bakersfield, 2008-11
California Valley Solar Ranch, San Luis Obispo County, 2009-10
Delano-Alpaugh Water Pipeline, Kern/Tulare Counties, 2006-09
I-15/SR-79 IC Project, Temecula, 2006-10
Westlake Historic Resources Survey, Los Angeles, 2008-09
CETAP, western Riverside County, 1999-2001
Los Coches Creek Elementary School, near Alpine, 2003-06
Oak Valley Specific Plan 1 Amendment, Beaumont, 2004
San Nicolas Island, Naval Base Ventura County, CA, 1997

SOURCE DOCUMENT 4

**Native American Consultation
December 5, 2022**

NATIVE AMERICAN HERITAGE COMMISSION

December 5, 2022

Naida Flores
Impact7G, Inc.

Via Email to: nflores@impact7g.com

Re: AT&T Mobility CSL00199 Woolsey Project, San Bernardino County

Dear Ms. Flores:

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: Cameron.vela@nahc.ca.gov.

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

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Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

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
12/5/2022**

**Gabrieleno/Tongva San Gabriel
Band of Mission Indians**

Anthony Morales, Chairperson
P.O. Box 693 Gabrieleno
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Gabrielino /Tongva Nation

Sandone Goad, Chairperson
106 1/2 Judge John Aiso St., Gabrielino
#231
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com

**Gabrielino Tongva Indians of
California Tribal Council**

Robert Dorame, Chairperson
P.O. Box 490 Gabrielino
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

**Gabrielino Tongva Indians of
California Tribal Council**

Christina Conley, Tribal
Consultant and Administrator
P.O. Box 941078 Gabrielino
Simi Valley, CA, 93094
Phone: (626) 407 - 8761
christina.marsden@alumni.usc.edu

Gabrielino-Tongva Tribe

Charles Alvarez,
23454 Vanowen Street Gabrielino
West Hills, CA, 91307
Phone: (310) 403 - 6048
roadkingcharles@aol.com

Kern Valley Indian Community

Brandy Kendricks,
30741 Foxridge Court Kawaiisu
Tehachapi, CA, 93561 Tubatulabal
Phone: (661) 821 - 1733 Koso
krazykendricks@hotmail.com

Kern Valley Indian Community

Julie Turner, Secretary
P.O. Box 1010 Kawaiisu
Lake Isabella, CA, 93240 Tubatulabal
Phone: (661) 340 - 0032 Koso

Kern Valley Indian Community

Robert Robinson, Chairperson
P.O. Box 1010 Kawaiisu
Lake Isabella, CA, 93240 Tubatulabal
Phone: (760) 378 - 2915 Koso
bbutterbredt@gmail.com

**Morongo Band of Mission
Indians**

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

**Morongo Band of Mission
Indians**

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

**Quechan Tribe of the Fort Yuma
Reservation**

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

**Quechan Tribe of the Fort Yuma
Reservation**

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

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 AT&T Mobility CSL00199 Woolsey Project, San Bernardino County.

**Native American Heritage Commission
Native American Contact List
San Bernardino County
12/5/2022**

**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

**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

**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**

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

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

**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

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 AT&T Mobility CSL00199 Woolsey Project, San Bernardino County.

Naida Flores

From: Gary Montana <garymontana@montanaandassociates.com>
Sent: Monday, January 02, 2023 8:03 AM
To: Naida Flores
Subject: Re: TCNS 258085:

NO adverse effects

On 12/27/2022 8:20 PM, Naida Flores wrote:

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Northwestern Band of Shoshone Nation documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)

NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301

LAT (Pole #1) 34° 32' 15.30" N, Long 117° 24' 01.14" W

Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: [515.473.6256](tel:515.473.6256) • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: [8951 Windsor Parkway, Johnston, IA 50131](https://www.impact7g.com)

www.impact7g.com



Naida Flores

From: Jill McCormick <historicpreservation@quechantribe.com>
Sent: Monday, December 12, 2022 6:18 AM
To: Naida Flores
Subject: RE: [EXTERNAL]:Request for Comment AT&T Mobility Project CSL00199: (W 037):

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.

*Thank you,
H. Jill McCormick, M.A.*

Quechan Indian Tribe
Historic Preservation Officer
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-572-2423
Cell: 928-261-0254
E-mail: historicpreservation@quechantribe.com



From: Naida Flores <nflores@impact7g.com>
Sent: Thursday, December 08, 2022 9:30 AM
To: Jill McCormick <historicpreservation@quechantribe.com>
Subject: [EXTERNAL]:Request for Comment AT&T Mobility Project CSL00199: (W 037):

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Ms. Jill McCormick,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno/Tongva San Gabriel Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: **AT&T Site CSL00199 (Woolsey) (FA #13014374)**
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Mr. Bonnie Bryant <Bonnie.Bryant@sanmanuel-nsn.gov>
Sent: Thursday, December 08, 2022 12:12 PM
To: Naida Flores
Subject: AT&T Site CSL00199 (Woolsey) (FA #13014374)

Hello Ms. Flores,

Thank you for providing the attached documentation, as requested within AT&T Site CSL00199 (Woolsey) (FA #13014374), on December 8, 2022, 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,
Mr. Bonnie Bryant
Cultural Resource technician
San Manuel Band of Mission Indians
Bonnie.Bryant@sanmanuel-nsn.gov

Mr. Bonnie Bryant
Cultural Resources Tech
Bonnie.Bryant@sanmanuel-nsn.gov
O:(909) 864-8933 x 50-2033

M:(909) 633-6615

26569 Community Center Dr Highland, California 92346



Naida Flores

From: towernotifyinfo@fcc.gov
Sent: Friday, November 04, 2022 12:01 AM
To: Naida Flores
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #8355548

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 - 407 Skull Valley Rd Skull Valley, 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 Kaitlyn Snodgrass - 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 Technician Bonnie Bryant - Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) - 26569 Community Center Drive Highland, CA - Bonnie.Bryant@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: 10/28/2022

Notification ID: 258085

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: AT&T Mobility

Consultant Name: Naida Flores

Street Address: 8951 Windsor Parkway

City: Johnston

State: IOWA

Zip Code: 50131

Phone: 515-256-5982

Email: nflores@impact7G.com

Structure Type: MTOWER - Monopole

Latitude: 34 deg 32 min 15.3 sec N

Longitude: 117 deg 24 min 1.1 sec W

Location Description: NW of Cactus Rd. HWY 395

City: Adelanto

State: CALIFORNIA

County: SAN BERNARDINO

Detailed Description of Project: (037) AT&T Mobility proposes to install a new 75-ft. mono-eucalyptus structure and associated equipment within a new lease area. Trench approx. 240-ft. for underground utilities.

Ground Elevation: 916.2 meters

Support Structure: 22.6 meters above ground level

Overall Structure: 22.9 meters above ground level

Overall Height AMSL: 939.1 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

Naida Flores

From: Mr. Bonnie Bryant <Bonnie.Bryant@sanmanuel-nsn.gov>
Sent: Wednesday, December 28, 2022 11:42 AM
To: Naida Flores
Subject: AT & T CSL00199 FA# 130144374

Hello Ms. Flores,

Thank you for providing the attached documentation, as requested AT & T CSL00199 FA# 130144374, on December 27, 2022, 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,
Mr. Bonnie Bryant
Cultural Resource technician
San Manuel Band of Mission Indians
Bonnie.Bryant@sanmanuel-nsn.gov

Mr. Bonnie Bryant
Cultural Resources Tech
Bonnie.Bryant@sanmanuel-nsn.gov
O:(909) 864-8933 x 50-2033

M:(909) 633-6615

26569 Community Center Dr Highland, California 92346



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:21 AM
To: gtribalcouncil@aol.com
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno/Tongva San Gabriel Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:24 AM
To: CHRISTINA CONLEY-HADDOCK
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Ms. Christina Conley,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno Tongva Indians of California Tribal Council documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:23 AM
To: Robert Dorame
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Chairperson Dorame,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno Tongva Indians of California Tribal Council documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:22 AM
To: sgoad@gabrielino-tongva.com
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrielino/Tongva Nation documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
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Impact7G, Inc. Project: AT&T West Phase 037

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Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com





December 8, 2022

Gabrielino-Tongva Tribe
Charles Alvarez
23454 Vanowen Street
West Hills, CA 91307

RE: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Dear Mr. Charles Alvarez,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrielino-Tongva Tribe documentation for the attached project. Our investigation includes determining if the stie is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site. A review request for the proposed project was submitted via the Tower Construction Notification System (TCNS).

RE: **AT&T Site CSL00199 (Woolsey) (FA #13014374)**
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Naida Flores", with a long horizontal line extending to the right.

Naida Flores
Impact7G, Inc.



Naida Flores
8951 Windsor Parkway
Johnston, IA 50131



Gabrielino-Tongva Tribe
Mr. Charles Alvarez
23454 Vanowen Street
West Hills, CA 91307
(CSL00199 - 037)

Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:26 AM
To: crazykendricks@hotmail.com
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Kern Valley Indian Community documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com





December 8, 2022

Kern Valley Indian Community
Julie Turner
P.O. Box 1010
Lake Isabella, CA 93240

RE: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Dear Ms. Julie Turner,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrielino-Tongva Tribe documentation for the attached project. Our investigation includes determining if the stie is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site. A review request for the proposed project was submitted via the Tower Construction Notification System (TCNS).

RE: **AT&T Site CSL00199 (Woolsey) (FA #13014374)**
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Naida Flores", with a long horizontal line extending to the right.

Naida Flores
Impact7G, Inc.



Naida Flores
8951 Windsor Parkway
Johnston, IA 50131



Kern Valley Indian Community
Ms. Julie Turner
P.O. Box 1010
Lake Isabella, CA 93240
(CSL00199 - 037)

Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:27 AM
To: bbutterbredt@gmail.com
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Kern Valley Indian Community documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 8:33 AM
To: Quechan Historic Preservation Officer
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Ms. Jill McCormick,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Quechan Tribe of Fort Yuma Reservation documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 9:07 AM
To: Jessica.Mauck@sanmanuel-nsn.gov
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the San Manuel Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 9:06 AM
To: Donna Yocum
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the San Fernando Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 9:09 AM
To: serranonation1@gmail.com
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Mr. Wayne Walker, Mr. Mark Cochrane,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Serrano Nation of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Thursday, December 08, 2022 9:10 AM
To: 29chairman@29palmsbomi-nsn.gov
Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Twenty-Nine Palms Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:03 PM
To: gttribalcouncil@aol.com
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Chairperson Anthony Morales,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:21 AM

To: gttribalcouncil@aol.com

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno/Tongva San Gabriel Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:09 PM
To: crazykendricks@hotmail.com
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Ms. Brandy Kendricks,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:26 AM

To: crazykendricks@hotmail.com

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

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NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

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Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131





December 27, 2022

Gabrielino-Tongva Tribe
Charles Alvarez
23454 Vanowen Street
West Hills, CA 91307

RE: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):

Dear Mr. Charles Alvarez,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrielino-Tongva Tribe documentation for the attached project. Our investigation includes determining if the stie is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site. A review request for the proposed project was submitted via the Tower Construction Notification System (TCNS).

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LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Naida Flores", with a long horizontal flourish extending to the right.

Naida Flores
Impact7G, Inc.



Naida Flores
8951 Windsor Parkway
Johnston, IA 50131



Gabrielino-Tongva Tribe
Mr. Charles Alvarez
23454 Vanowen Street
West Hills, CA 91307
(W 037 - CSL00199)

Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:11 PM
To: roadkingcharles@aol.com; chavez1956@gmail.com
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Mr. Charles Alvarez,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:25 AM

To: roadkingcharles@aol.com; chavez@1956gmail.com; chavez1956@gmail.com

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrielino-Tongva Tribe documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:00 PM
To: CHRISTINA CONLEY-HADDOCK
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Ms. Christina Conley,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:24 AM

To: CHRISTINA CONLEY-HADDOCK <christina.marsden@alumni.usc.edu>

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello Ms. Christina Conley,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno Tongva Indians of California Tribal Council documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

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Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:01 PM
To: Donna Yocum
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Chairperson Donna Yocum,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 9:06 AM

To: Donna Yocum <ddyocum@comcast.net>

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the San Fernando Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:07 PM
To: jessica.mauck@sanmanuel-nsn.gov
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf; CSL00199 - Woosley Report 12.21.22.pdf

Hello Ms. Jessica Mauck,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 9:07 AM

To: Jessica.Mauck@sanmanuel-nsn.gov

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the San Manuel Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131





December 27, 2022

Kern Valley Indian Community
Julie Turner, Secretary
P.O. Box 1010
Lake Isabella, CA 93240

RE: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):

Dear Ms. Julie Turner,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Kern Valley Indian Community documentation for the attached project. Our investigation includes determining if the stie is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site. A review request for the proposed project was submitted via the Tower Construction Notification System (TCNS).

RE: **AT&T Site CSL00199 (Woolsey) (FA #13014374)**
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Naida Flores", with a long horizontal flourish extending to the right.

Naida Flores
Impact7G, Inc.



Naida Flores
8951 Windsor Parkway
Johnston, IA 50131



Kern Valley Indian Community
Ms. Julie Turner
P.O. Box 1010
Lake Isabella, CA 93240
(W 037 - CSL00199)

Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:15 PM
To: 29chairman@29palmsbomi-nsn.gov
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf; CSL00199 - Woosley Report 12.21.22.pdf

Hello Chairperson Darrell Mike,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 9:10 AM

To: 29chairman@29palmsbomi-nsn.gov

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Twenty-Nine Palms Band of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131

www.impact7g.com



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:11 PM
To: gtongva@gmail.com
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Chairperson Dorame,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:23 AM

To: Robert Dorame <gtongva@gmail.com>

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello Chairperson Dorame,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrieleno Tongva Indians of California Tribal Council documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 2:59 PM
To: bbutterbredt@gmail.com
Subject: RE: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello Chairperson Robert Robinson,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:27 AM

To: bbutterbredt@gmail.com

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Kern Valley Indian Community documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:13 PM
To: sgoad@gabrielino-tongva.com
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Chairperson Sandonne Goad,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 8:22 AM

To: sgoad@gabrielino-tongva.com

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Gabrielino/Tongva Nation documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



Naida Flores

From: Naida Flores
Sent: Tuesday, December 27, 2022 3:12 PM
To: serranonation1@gmail.com
Subject: FW: Follow Up Request for Comment AT&T Mobility Project CSL00199: (W 037):
Attachments: CSL00199 NAHC.Impact7g.12.08.22.pdf

Hello Mr. Wayne Walker, Mr. Mark Cochrane,

This is a follow up request for the above listed AT&T Mobility project. Please feel free to contact me with any questions you may have.

Regards,

Naida Flores

Sr. Environmental Specialist

Office: 515.473.6256

From: Naida Flores

Sent: Thursday, December 08, 2022 9:09 AM

To: serranonation1@gmail.com

Subject: Request for Comment AT&T Mobility Project CSL00199: (W 037):

Hello Mr. Wayne Walker, Mr. Mark Cochrane,

Impact7G, Inc. (Impact7G) is in the process of completing a compliance review to provide the Serrano Nation of Mission Indians documentation for the attached project. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the view shed of an Indian Religious site.

RE: AT&T Site CSL00199 (Woolsey) (FA #13014374)
NW of Cactus Road HWY 395, Adelanto, San Bernardino County, CA 92301
LAT 34° 32' 15.30" N, Long 117° 24' 01.14" W
Impact7G, Inc. Project: AT&T West Phase 037

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at nflores@impact7g.com and thank you for your assistance.

Regards,

Naida Flores

Environmental Specialist II

Office: 515.473.6256 • **Mobile:** 626.826.7836

Impact7G, Inc.

Project Office: Redlands, CA

HQ: 8951 Windsor Parkway, Johnston, IA 50131



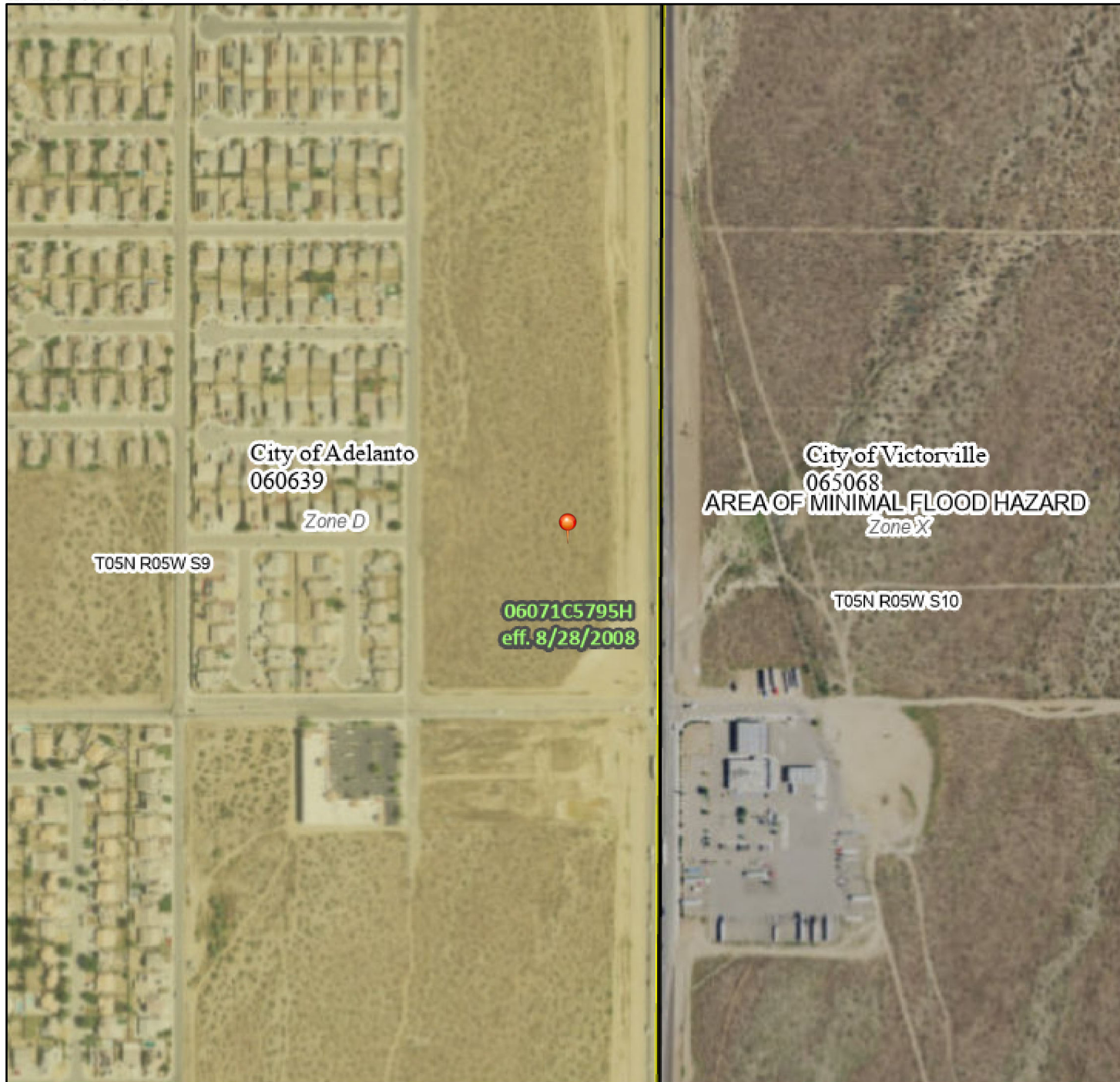
SOURCE DOCUMENT 5

Flood Insurance Rate Map

National Flood Hazard Layer FIRMette



117°24'20"W 34°32'28"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- | | | |
|------------------------------------|--|--|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
<i>Zone A, V, A99</i> |
| | | With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i> |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i> |
| | | Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i> |
| | | Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i> |
| | | Area with Flood Risk due to Levee <i>Zone D</i> |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i> |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard <i>Zone D</i> |
| | | Channel, Culvert, or Storm Sewer |
| | | Levee, Dike, or Floodwall |
| OTHER FEATURES | | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation |
| | | 17.5 Cross Sections with 1% Annual Chance Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| MAP PANELS | | Jurisdiction Boundary |
| | | Coastal Transect Baseline |
| | | Profile Baseline |
| | | Hydrographic Feature |
| | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |

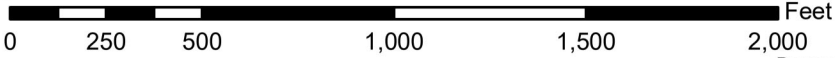


The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 1/18/2023 at 1:56 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

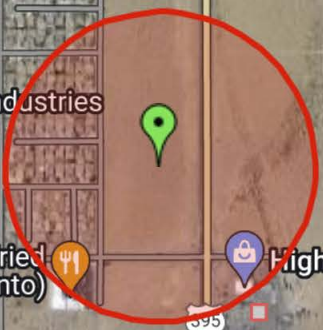
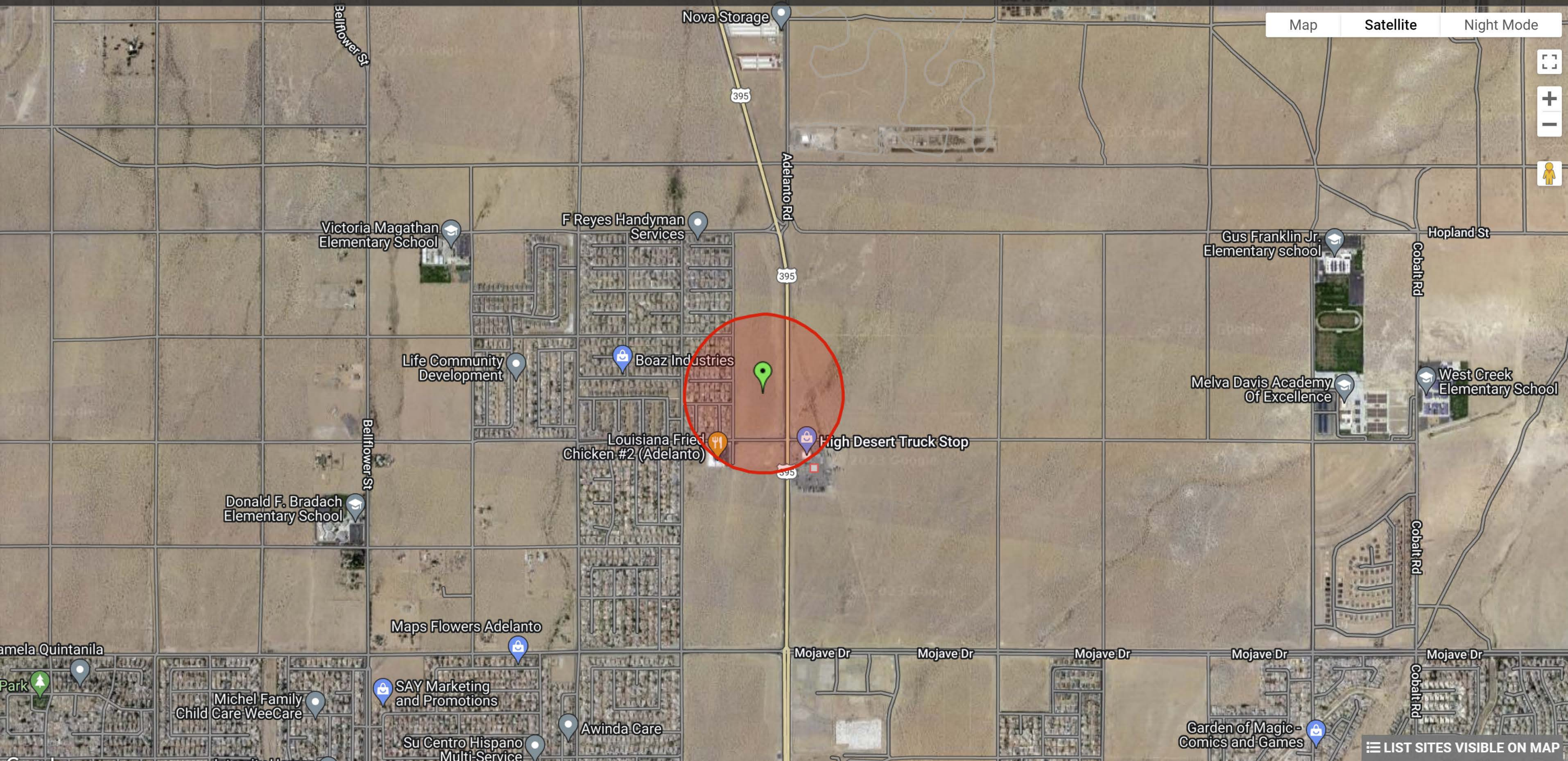


1:6,000

117°23'42"W 34°31'59"N

SOURCE DOCUMENT 6

Geotracker Hazardous Materials Database



Nova Storage

Victoria Magathan Elementary School

F Reyes Handyman Services

Gus Franklin Jr. Elementary school

Life Community Development

Boaz Industries

Melva Davis Academy Of Excellence

Donald F. Bradach Elementary School

Louisiana Fried Chicken #2 (Adelanto)

High Desert Truck Stop

West Creek Elementary School

Maps Flowers Adelanto

Amela Quintanilla

Michel Family Child Care WeeCare

SAY Marketing and Promotions

Su Centro Hispano Multi-Service

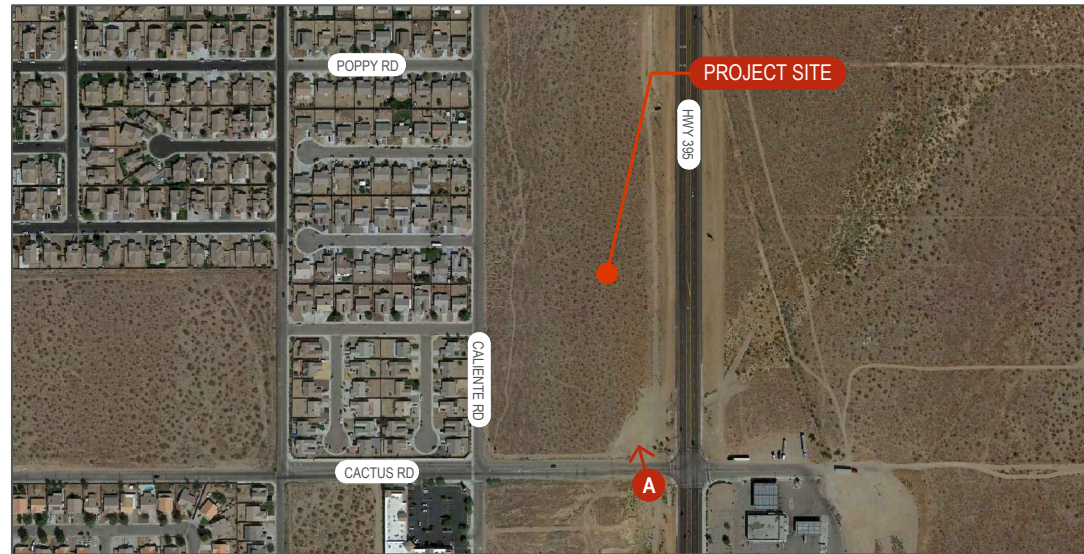
Awinda Care

Garden of Magic - Comics and Games

SOURCE DOCUMENT 7

Photo Simulations

AERIAL MAP



COPYRIGHT: GOOGLE MAPS, 2022

EXISTING



PROPOSED

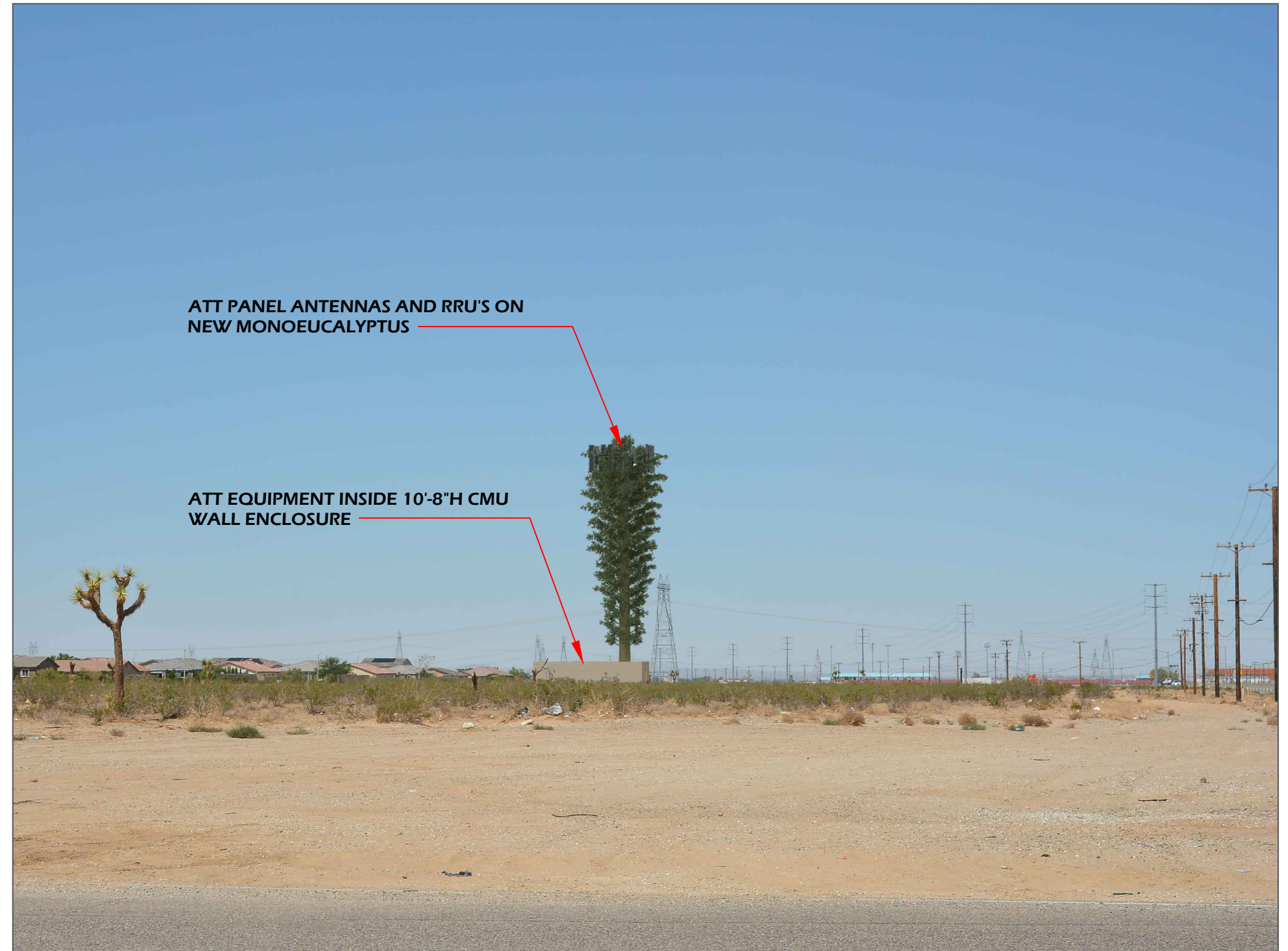


PHOTO PROVIDED BY: DRAFTLINK



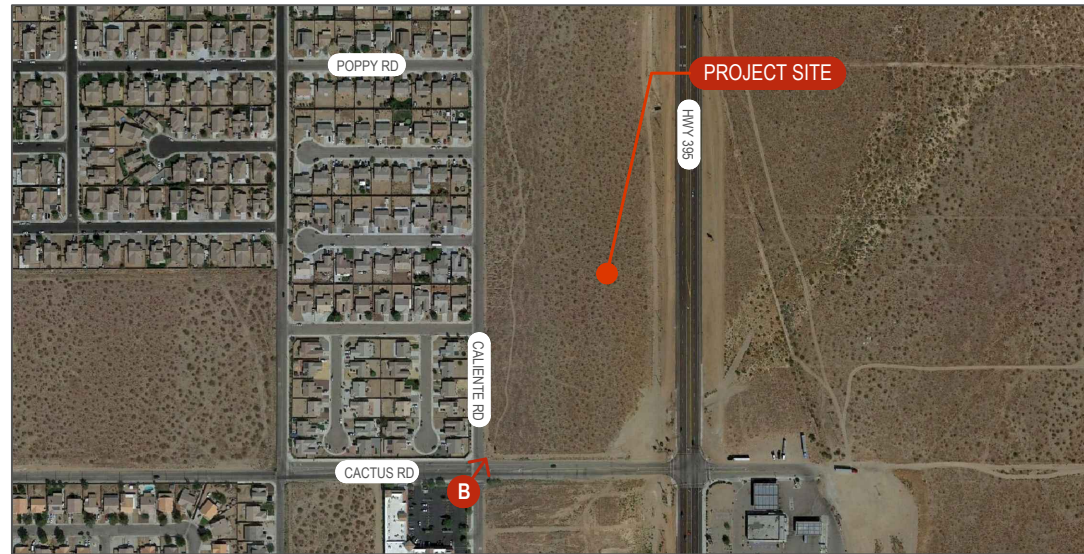
24310 MOULTON PARKWAY
 SUITE 0 #1009
 LAGUNA HILLS, CA 92637-3306
 CONTACT: BRETT SMIRL



CSL00199
WOOLSEY
 34.537584, -117.400317
 NW OF CACTUS ROAD HWY 395
 ADELANTO, CA 92301

VIEW	SHEET
A	1 / 3

AERIAL MAP



COPYRIGHT: GOOGLE MAPS, 2022

EXISTING



PROPOSED



PHOTO PROVIDED BY: DRAFTLINK



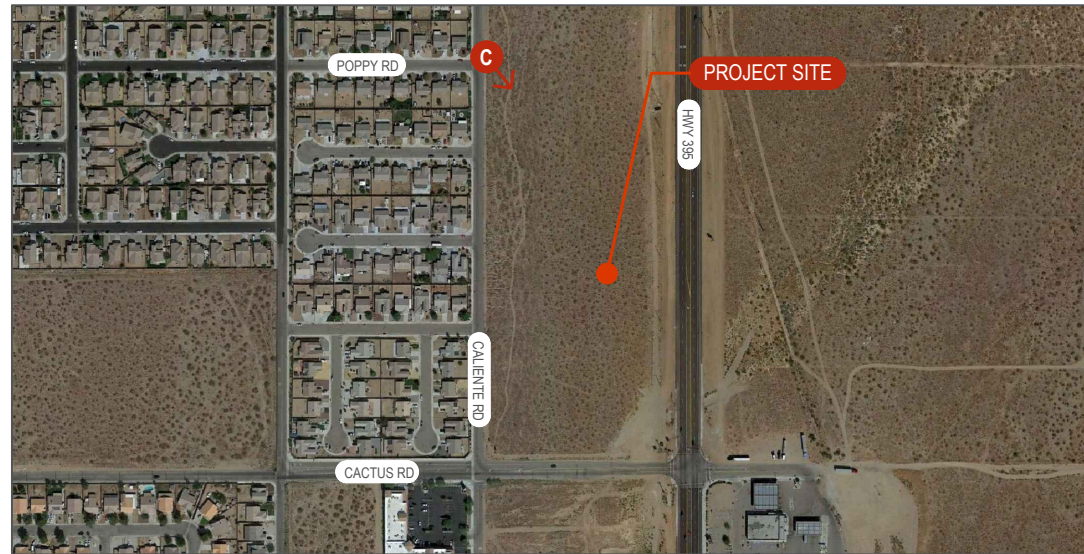
24310 MOULTON PARKWAY
 SUITE 0 #1009
 LAGUNA HILLS, CA 92637-3306
 CONTACT: BRETT SMIRL



CSL00199
WOOLSEY
 34.537584, -117.400317
 NW OF CACTUS ROAD HWY 395
 ADELANTO, CA 92301

VIEW	SHEET
B	2 / 3

AERIAL MAP



COPYRIGHT: GOOGLE MAPS, 2022

EXISTING



PROPOSED



PHOTO PROVIDED BY: DRAFTLINK



24310 MOULTON PARKWAY
 SUITE 0 #1009
 LAGUNA HILLS, CA 92637-3306
 CONTACT: BRETT SMIRL



CSL00199
WOOLSEY
 34.537584, -117.400317
 NW OF CACTUS ROAD HWY 395
 ADELANTO, CA 92301

VIEW	SHEET
C	3 / 3