

**DRAFT**

# **INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION**

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**SUMMIT RV & STORAGE  
8899 THREE FLAGS AVENUE  
HESPERIA, CALIFORNIA 92344  
APN 3064-591-14**



**LEAD AGENCY:**

**CITY OF HESPERIA  
PLANNING DIVISION  
9700 SEVENTH AVENUE  
HESPERIA, CALIFORNIA 92345**

**REPORT PREPARED BY:**

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**FEBRUARY 22, 2022**

HESP 001

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## MITIGATED NEGATIVE DECLARATION

**PROJECT NAME:** Summit RV and Storage

**PROJECT APPLICANT:** The Applicant for the proposed project is Mr. Sumit Brahmabhatt, President, AIA, LEED, Brahmabhatt Architects, 980 Corporate Center Drive Pomona, California, 91768.

**PROJECT LOCATION:** The proposed project site is located at 8899 Three Flags Avenue in the northwestern portion of the City of Hesperia, California. The corresponding Assessor Parcel Number (APN) is 3064-591-014. The proposed project site is located to the east of the Three Flags Avenue between two access roads that provide a connection to the commercial uses located to the east of the project site. The project site's latitude and longitude are 34°41'32.13" N; -117°39'38.15" W. The project site's is located within the Baldy Mesa, California 7 1/2 Minute USGS Quadrangle (Township 4 North, Range 5 West, Section 22) 1956.

**CITY AND COUNTY:** City of Hesperia, San Bernardino County.

**PROJECT:** The proposed project would involve the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.

**FINDINGS:** The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any significant adverse unmitigable impacts. For this reason, the City of Hesperia determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

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## 1. INTRODUCTION

### OVERVIEW OF THE PROPOSED PROJECT

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>1</sup>

### PURPOSE OF THIS STUDY

The City of Hesperia is the designated *Lead Agency*, and as such, the City will be responsible for the project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.<sup>2</sup> As part of the proposed project's environmental review, the City of Hesperia has authorized the preparation of this Initial Study.<sup>3</sup> The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Hesperia with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a project;
- To facilitate the project's environmental assessment early in the design and development of the proposed project;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated the proposed project.

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<sup>1</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>2</sup> California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions*. as Amended 2001. §21067.

<sup>3</sup> Ibid. (CEQA Guidelines) §15050.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Hesperia, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.<sup>4</sup> This Initial Study and the *Notice of Intent to Adopt (NOIA) a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.<sup>5</sup> Questions and/or comments should be submitted to the following:

City of Hesperia Development Department, Planning Division  
9700 Seventh Avenue  
Hesperia, California 92345

## INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.

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<sup>4</sup> California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069.* 2000.

<sup>5</sup> California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b).* 2000.

## 2. PROJECT DESCRIPTION

### PROJECT LOCATION

The proposed project site is located in the southwest portion of the City of Hesperia. The City of Hesperia is located in southwestern portion of San Bernardino County in the southwestern Mojave Desert physiographic subregion. This physiographic subregion is more commonly referred to as either the "Victor Valley" or the "High Desert" due to its approximate elevation of 2,900 feet above sea level. The Victor Valley is separated from the more populated areas of coastal Southern California by the San Bernardino and San Gabriel mountains.

The City of Hesperia is bounded on the north by Victorville and Apple Valley, unincorporated San Bernardino County (Oro Grande); on the east by Apple Valley and unincorporated San Bernardino County (Bell Mountain); the south by the City of Hesperia and unincorporated San Bernardino County (Oak Hills); and on the west by unincorporated San Bernardino County (Baldy Mesa).<sup>6</sup> Regional access to the City of Hesperia is provided by three area highways: the Mojave Freeway (Interstate 15), extending in a southwest to northeast orientation through the center of the City; U.S. Highway 395, traversing the western portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), which traverses the southern portion of the City in an east to west orientation.<sup>7</sup> The location of Hesperia, in a regional context, is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2.

The proposed project site is located at 8899 Three Flags Avenue in the northwestern portion of the City of Hesperia, California. The corresponding Assessor Parcel Number (APN) is 3064-591-014. The proposed project site is located to the east of the Three Flags Avenue between two access roads that provide a connection to the commercial uses located to the east of the project site. The project site's latitude and longitude are 34°41'32.13"; -117°39'38.15". The project site's is located within the Baldy Mesa, California 7 ½ Minute USGS Quadrangle (Township 4 North, Range 5 West, Section 22) 1956. A local vicinity map is provided in Exhibit 2-3. An aerial photograph of the site and the surrounding area is provided in Exhibit 2-4.

### ENVIRONMENTAL SETTING

The proposed project site is located on a 7.33-acre (319,295 square-feet) parcel that is currently vacant though it has been used for vehicle storage. The property currently has a Zoning land use designation of Commercial Industrial Business Park (CIBP). Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* A private road extends along the project site's north side. Further north is the Velocity Truck Center® (8995 Three Flags Avenue). This property is zoned as Commercial Industrial Business Park (CIBP).<sup>8</sup>

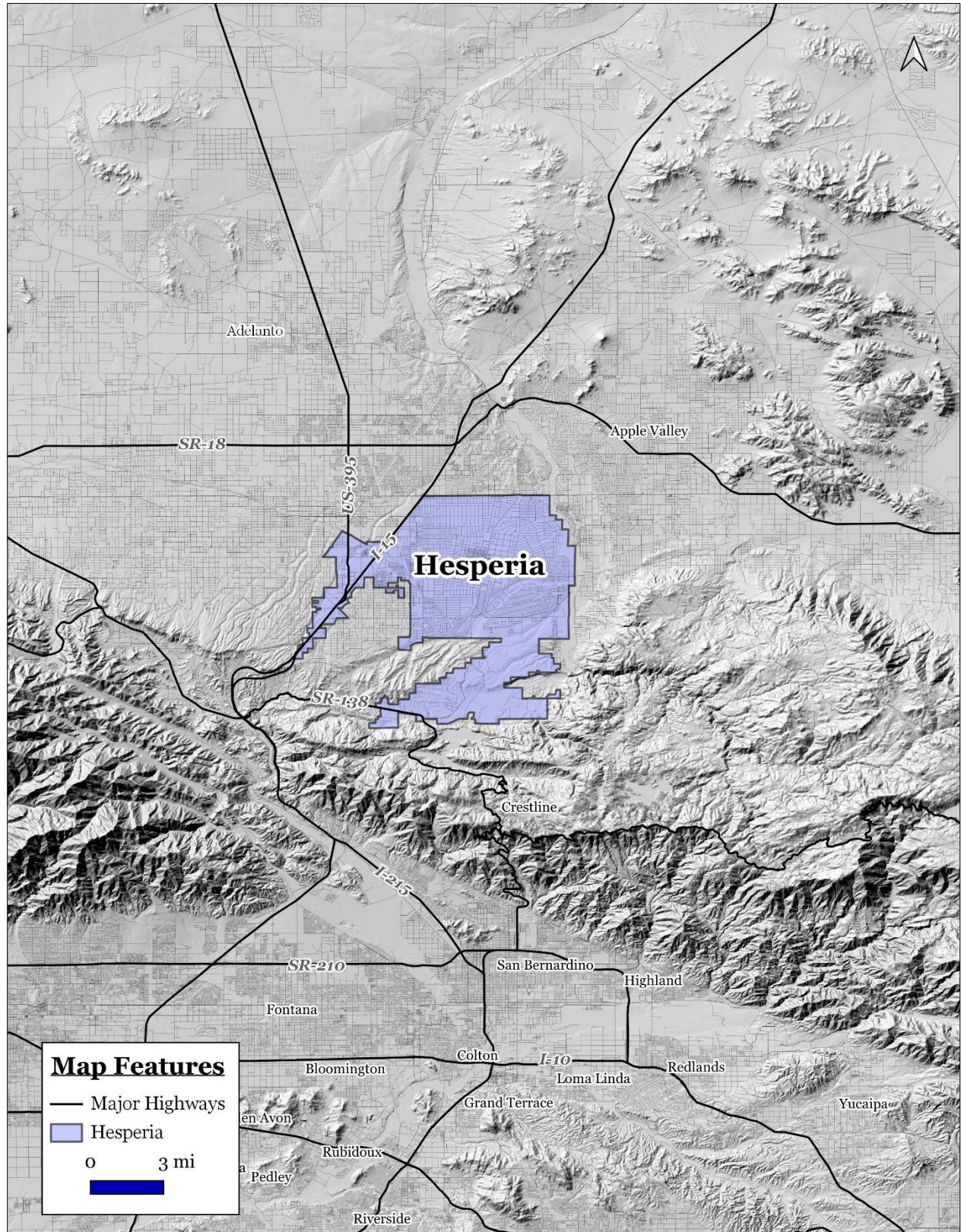
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<sup>6</sup> Blodgett Baylosis Environmental Planning. 2022.

<sup>7</sup> Google Earth. Website accessed January 17, 2022.

<sup>8</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

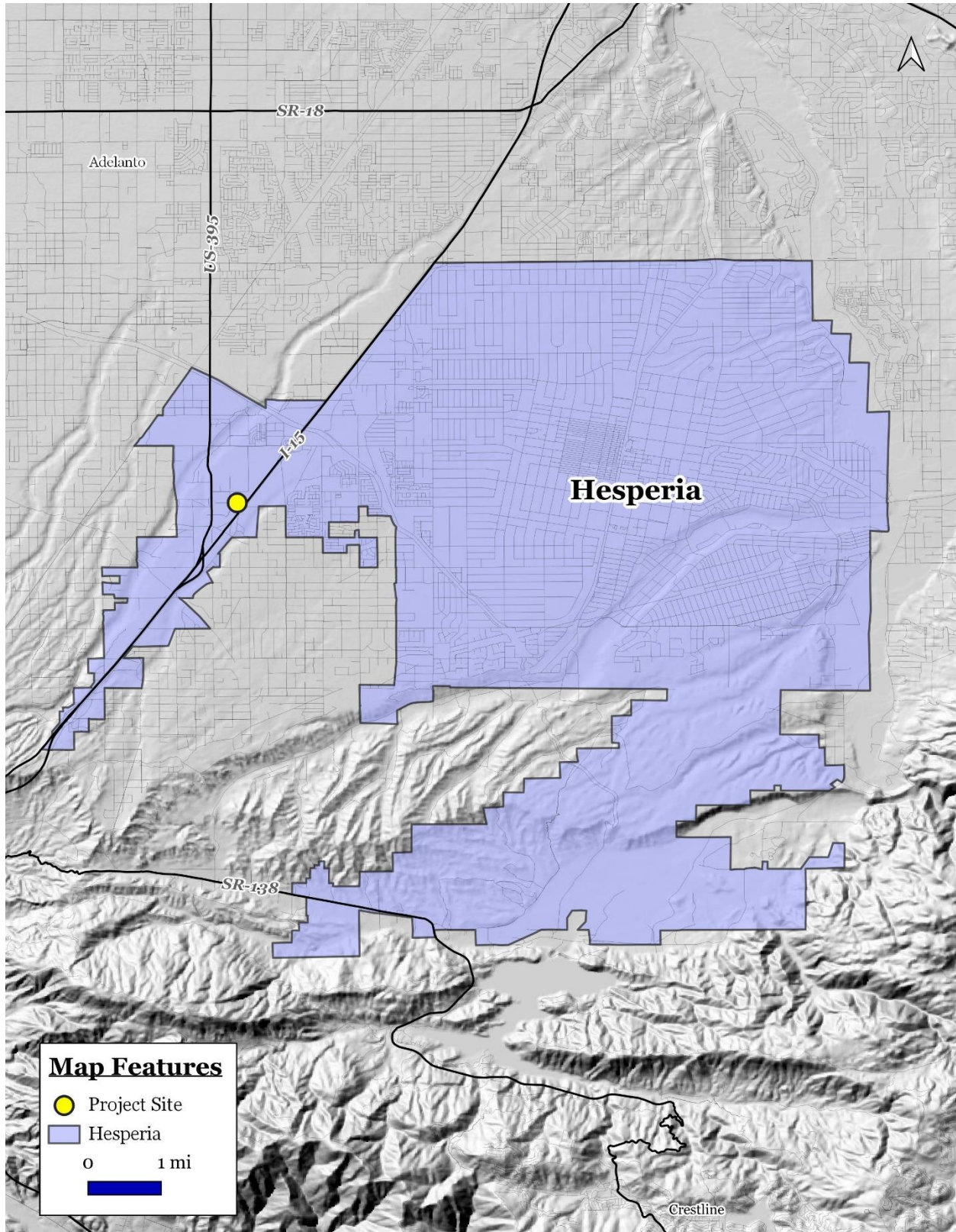




## EXHIBIT 2-1 REGIONAL MAP

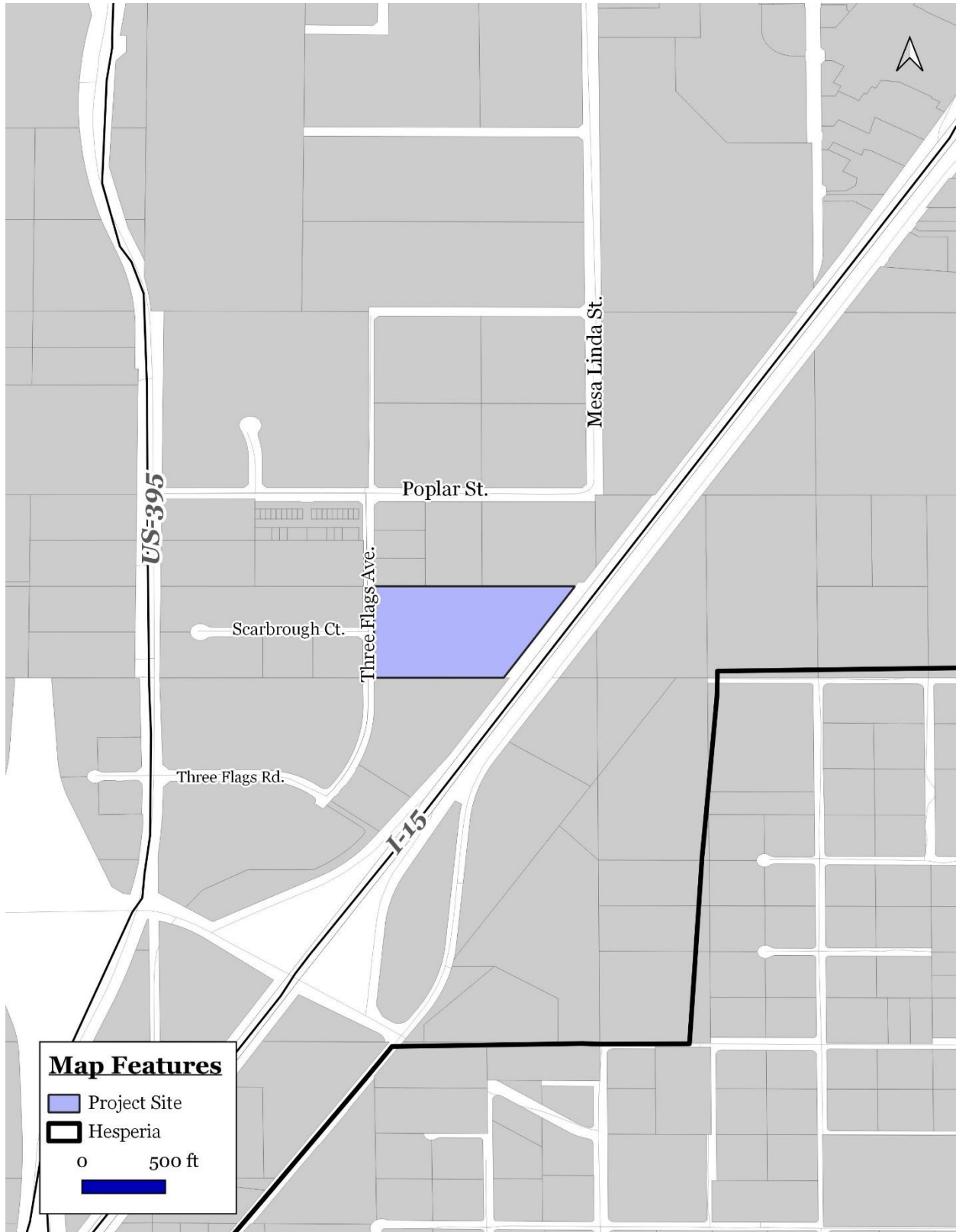
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING





## EXHIBIT 2-2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING



## EXHIBIT 2-3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING





**EXHIBIT 2-4**  
**AERIAL IMAGE OF PROJECT SITE**  
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *East of the project site:* Abutting the project site to the east commercially developed land that includes Little Sister's Truck Wash® (8899 Three Flags Avenue) and Goodyear Commercial Tire and Service Center® (8893 Three Flags Avenue). To the east of these uses is the Interstate 15 Freeway. This area is zoned as Commercial Industrial Business Park (CIBP).<sup>9</sup>
- *South of the project site:* A vacant lot that is being used for the storage of truck trailers is located to the south of the project site. This area is zoned Commercial Industrial Business Park (CIBP).<sup>10</sup>
- *West of the project site:* Three Flags Avenue extends along the project site's west side. A vacant lot and a commercial office use, Riverside Asset Management (12269 Scarbrough Court) is located along the east side of this roadway. This area is zoned as Commercial Industrial Business Park (CIBP).<sup>11</sup>

An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4.

## **PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT**

The key physical elements of the proposed project are outlined below. A copy of the site plan is illustrated in Exhibit 2-5.

- *Site Plan.* The development site is a 7.33-acre property that will be developed as a RV storage and personal storage facility. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided.<sup>12</sup>
- *Office and Manager's Residence.* The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet.<sup>13</sup> The office building would include both offices and a work shop. The manager's residence will consist of a two-bedroom, two-bathroom unit.
- *Storage Facilities.* Storage buildings would be located around the site's perimeter. A total of 428 storage units would be provided, totaling 97,250 square feet.<sup>14</sup> The individual storage units would range in size from 10 feet by 10 feet to 10 feet by 20 feet. The units would consist of prefabricated construction and would be assembled onsite.

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<sup>9</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

<sup>10</sup> Ibid.

<sup>11</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

<sup>12</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>13</sup> Ibid.

<sup>14</sup> Ibid.

- *RV Storage.* The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided.<sup>15</sup>
- *Parking.* A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking.<sup>16</sup> The parking area would be located immediately to the south and east of the office.
- *Access and Circulation.* Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet.<sup>17</sup>
- A total of 40,415 square feet would be landscaped. The area not covered over in pervious surfaces would consist of asphalt/concrete (A/C).<sup>18</sup>

The proposed site plan is illustrated in Exhibit 2-5.

## **OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT**

The proposed project is anticipated to employ between 6 to 8 persons. The hours of operation for the proposed project would be seven days a week, 24-hours a day.

## **CONSTRUCTION CHARACTERISTICS**

The construction for the current proposed project is assumed to commence in August 2022 and would take approximately five months to complete.<sup>19</sup> The key construction phases are outlined in the paragraphs that follow.

- *Grading and Site Preparation Phase.* The project site would be graded and readied for the construction. This phase would require two to three months to complete. During this phase, the building footings, utility lines, and other underground infrastructure would be installed. This phase would require one month to complete.
- *Building Construction Phase.* The new buildings would be installed during this phase. This phase will take approximately three months to complete. The new structures would be transported and assembled on the project site.
- *Paving, Landscaping, and Finishing Phase* The site will be paved during this phase and the improvements will be painted. This phase will take approximately one to one month to complete.

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<sup>15</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>16</sup> Ibid.

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

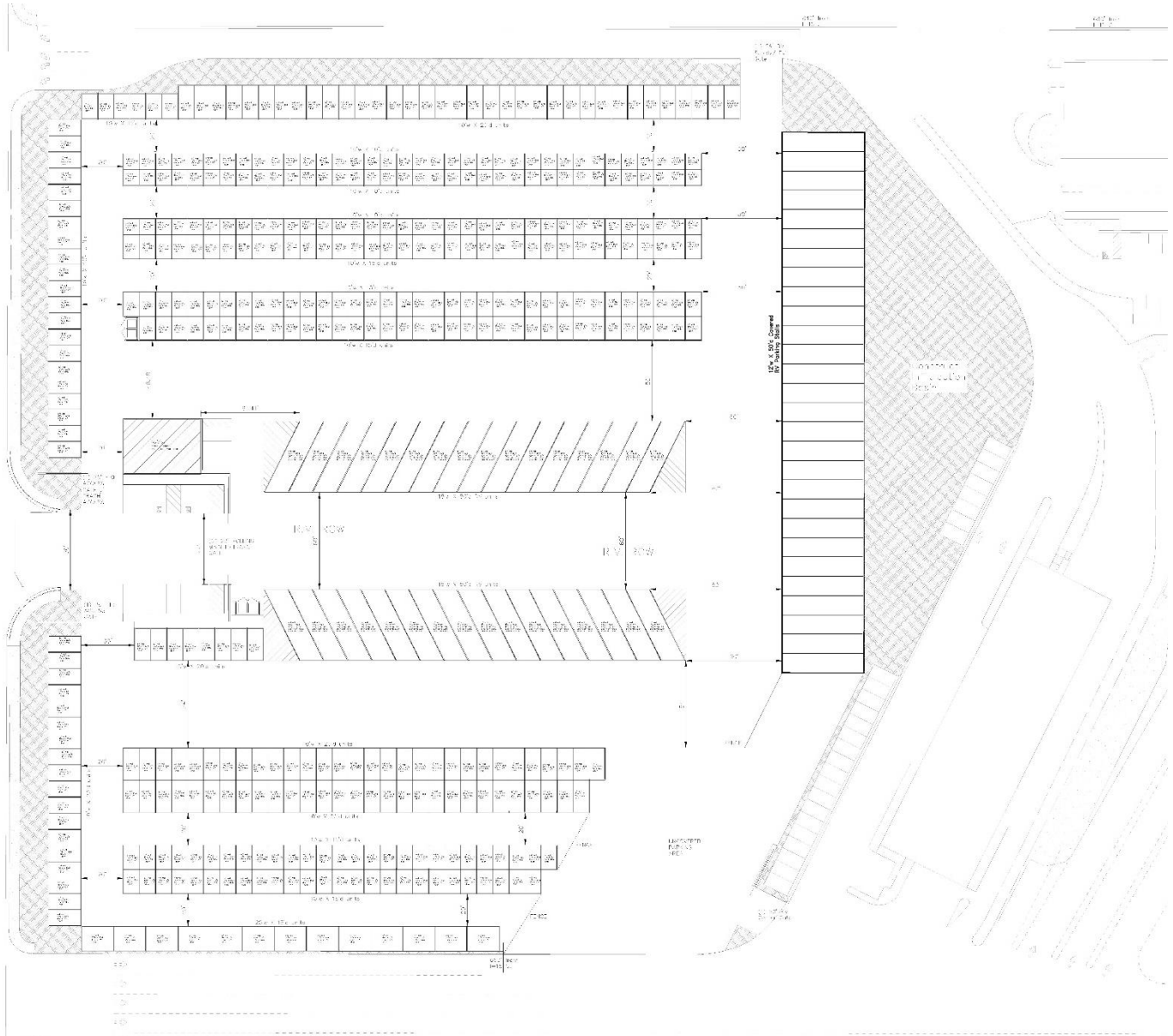
<sup>19</sup> Ibid.

## **DISCRETIONARY ACTIONS**

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Hesperia) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- Approval of a Conditional Use Permit; and
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

CITY OF HESPERIA • INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
SUMMIT RV & STORAGE • 8899 THREE FLAGS AVENUE



**EXHIBIT 2-5**  
**SITE PLAN OF PROJECT SITE**  
SOURCE: LAND DEVELOPMENT DESIGN COMPANY

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### 3. ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics;	Mineral Resources ;
Agricultural & Forestry Resources;	Noise ;
Air Quality;	Population & Housing;
Biological Resources;	Public Services;
Cultural Resources;	Recreation;
Energy;	Transportation;
Geology & Soils;	Tribal Cultural Resources;
Greenhouse Gas Emissions;	Utilities;
Hazards & Hazardous Materials;	Wildfire; and,
Hydrology & Water Quality;	Mandatory Findings of Significance.
Land Use & Planning;	

The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Hesperia in its environmental review process (refer to Section 1.3 herein). Under each issue area, an analysis of impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated, and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact.* The proposed project *will not* have any measurable environmental impact on the environment.
- *Less Than Significant Impact.* The proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Hesperia or other responsible agencies consider to be significant.
- *Less Than Significant Impact with Mitigation.* The proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Hesperia in deciding as to whether there is a potential for significant adverse impacts on the environment associated with the implementation of the proposed project.

## AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?			×	
B. Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				×
C. Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				×
D. Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

### A. Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista? • No Impact

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 40,415 square feet would be landscaped.<sup>20</sup> The property currently has a Zoning land use designation of Commercial Industrial Business Park (CIBP). Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* A private road extends along the project site's north side. Further north is the Velocity Truck Center® (8995 Three Flags Avenue). This property is zoned as Commercial Industrial Business Park (CIBP).<sup>21</sup>
- *East of the project site:* Abutting the project site to the east commercially developed land that includes Little Sister's Truck Wash® (8899 Three Flags Avenue) and Goodyear Commercial Tire

<sup>20</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>21</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.



and Service Center® (8893 Three Flags Road). To the east of these uses is the Interstate 15 Freeway. This area is zoned as Commercial Industrial Business Park (CIBP).<sup>22</sup>

- *South of the project site:* A vacant lot that is being used for the storage of truck trailers is located to the south of the project site. This area is zoned Commercial Industrial Business Park (CIBP).<sup>23</sup>
- *West of the project site:* Three Flags Avenue extends along the project site's west side. A vacant lot and a commercial office use, Riverside Asset Management (12269 Scarbrough Court) is located along the east side of this roadway. This area is zoned as Commercial Industrial Business Park (CIBP).<sup>24</sup>

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located south, southwest and southeast of the site. In addition, local views are already dominated by neighboring development and the nearby I-15 freeway. The proposed project shall be designed, constructed, and operated in accordance with General Plan Policy LU-8.5 of the Land Use Element, which requires all development within the City to "Adopt design standards which will assure land use compatibility and enhance the visual environment, by providing attractive, aesthetically pleasing development which is sensitive to the unique local characteristics of the Hesperia community."

In accordance with City policy, the Applicant shall provide replacement landscaping or vegetation to disturbed areas consistent with the natural surroundings, and in accordance with City Municipal Code Section 16.24.150 (Subject Desert Native Plants) and County Codes 88.01.050 (Tree or Plant Removal Permits) and 88.01.060 (Desert Native Plant Protection). Pursuant to these codes, landscaping shall be selected and incorporated to be drought-tolerant and shall complement existing natural and manmade features, including the dominant landscaping of surrounding areas. Through compliance with the City General Plan and Municipal Code, the proposed project would minimize the contrast between project features and the surrounding Mojave Desert landscape and ensure adverse effects on scenic vistas remain less than significant. No mitigation is required. In addition, views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. As a result, the impacts will be less than significant.

**B.** *Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?* • *No Impact.*

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.<sup>25</sup> There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 10.74 miles southwest of the City; SR-58 (from SR-14 to I-15), located 35.63 miles north of the City; SR-138 (from SR-2 to SR-18), located 6.23 miles south of the City; SR-173 (from SR-138 to SR-18), located 7.69 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 25.75 miles east of

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<sup>22</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

<sup>23</sup> Ibid.

<sup>24</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

<sup>25</sup> California Department of Transportation. *Official Designated Scenic Highways.*

the project site. The City of Hesperia General Plan identifies prominent view sheds within the City. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.<sup>26</sup> The Oro Grande Wash is the nearest visually sensitive area located nearest to the site though it will not be visually impacted by the proposed project due to the site's distance and separation. The entire wash is located within the Oak Hills community and is used as a buffer between the commercial/industrial uses located adjacent to the freeway and the rural residential uses within the Oak Hills community. The proposed project site itself does not contain any sensitive habitats. Lastly, the project site does not contain any buildings listed in the State or National registry. As a result, no impacts will occur.

- C.** *Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • No Impact*

There are no protected views in the vicinity of the project site and the City does not contain any scenic vistas in the vicinity of the project site. In addition, the City does not have any zoning regulations or other regulations governing scenic quality other than the development standards for which the new building will conform to. As a result, no impacts will occur.

- D.** *Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? • No Impact*

The proposed project would not expose any sensitive receptors to daytime or nighttime light trespass, since there are no light-sensitive land uses located adjacent to the property. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. In addition, the City of Hesperia Municipal Code Section 16.16.415 includes design standards for outdoor lighting that apply to industrial development in the City (the site is located in the Commercial Industrial Business Park (CIPD) zone district. The site's development will require installation of outdoor lighting necessary for safety and security as well as to accommodate night-time business operations.

All lighting will comply with the development standards contained in the City's Zoning Code. The Municipal code lighting standards govern the placement and design of outdoor lighting fixtures to ensure adequate lighting for public safety while also minimizing light pollution and glare and precluding nuisance (e.g., blinking/flashing lights, unusually high intensity or needlessly bright lighting). Therefore, Less Than Significant Impacts with Mitigation will occur. As a result, no light-related impacts are anticipated.

## **MITIGATION MEASURES**

The analysis of aesthetics indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

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<sup>26</sup> City of Hesperia General Plan Website accessed on January 17, 2022.

## AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				×
<b>B.</b> Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				×
<b>C.</b> 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))?				×
<b>D.</b> Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				×
<b>E.</b> 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 a non-forest use?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses? • No Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 40,415 square feet would be landscaped.<sup>27</sup>

According to the California Department of Conservation, the project site nor the surrounding properties do not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. As a result, no impacts will occur.<sup>11</sup>

<sup>27</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>11</sup> California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*.

**B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? • No Impact.***

The project site is currently zoned as Commercial Industrial Business Park (CIBP). The property is vacant though it has been used for vehicle parking. There are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.<sup>28</sup> As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.

**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.***

There are no forest lands or timber lands located within or adjacent to the site. An adjacent property located to the north is disturbed and contains built-up structures. Furthermore, the site's existing zoning designation (Commercial Industrial Business Park [CIBP]) does not contemplate forest land or timber land uses. As a result, no impacts will occur.

**D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? • No Impact.***

No forest lands are located within the project site. The proposed use will be restricted to the site and will not affect any land under the jurisdiction of the BLM. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation.

**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 a non-forest use? • No Impact.***

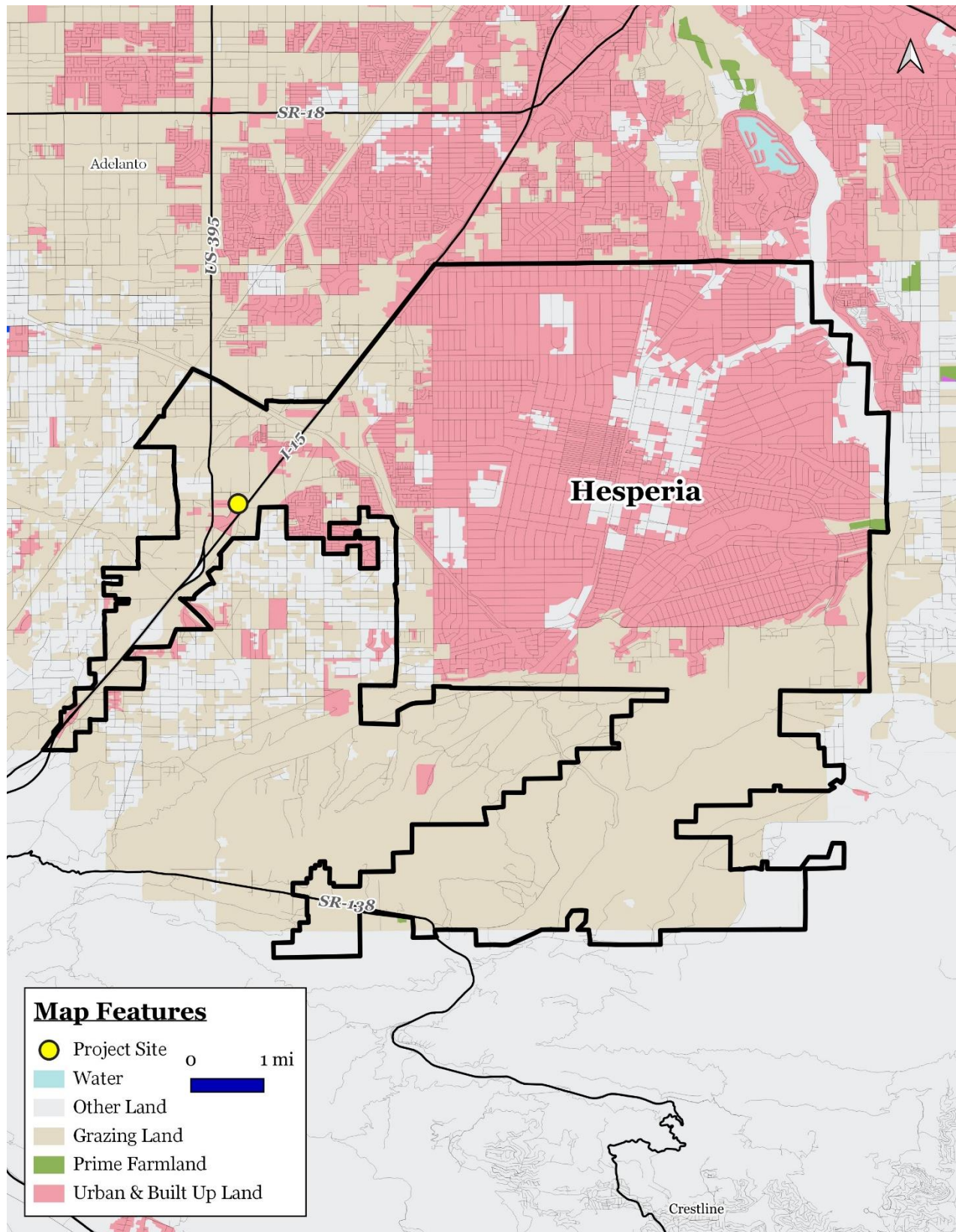
The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use. The site does not contain any agricultural or forestry vegetation. As a result, no farmland conversion impacts will occur with the implementation of the proposed project.

## **MITIGATION MEASURES**

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

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<sup>28</sup> California Department of Conservation. *State of California Williamson Act Contract Land*.  
<https://www.conservation.ca.gov/dlrp/wa>.



### EXHIBIT 3-1 AGRICULTURAL MAP

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

## AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				×
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?			×	
C. Would the project expose sensitive receptors to substantial pollutant concentrations?				×
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

### A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? • No Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. A total of 40,415 square feet would be landscaped.<sup>29</sup>

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The city is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.<sup>30</sup> The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-

<sup>29</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>30</sup> Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone ( $O_3$ )* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).
- *Nitrogen Oxide ( $NO_x$ )* is a yellowish-brown gas, which at high levels can cause breathing difficulties.  $NO_x$  is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide ( $NO_x$ ).
- *Sulfur Dioxide ( $SO_2$ )* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides ( $SO_x$ ).
- *$PM_{10}$  and  $PM_{2.5}$*  refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of  $PM_{10}$  and 65 pounds per day of  $PM_{2.5}$ .
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of “smog.” The daily threshold is 137 pounds per day of ROG.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2020-2045 RTP/SCS, the City of Hesperia is projected to add a total of 74,400 new residents and 23,600 new employees through the year 2045<sup>31</sup>. The proposed project will not introduce new residents and is anticipated to employ between 6 and 8 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project’s construction emissions would be below the thresholds of significance established by the MDAQMD (the project’s daily construction emissions are summarized in Table 3-1). In addition, the proposed project’s long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). As a result, no conformity impacts will occur.

- 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? • Less than Significant Impact.**

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<sup>31</sup> Southern California Association of Governments. 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy. Demographics & Growth Forecast*. November 2021.

According to the SCAQMD, any project is significant if it triggers or exceeds the SCAQMD daily emissions threshold identified previously and noted at the bottom of Tables 3-1 and 3-2. In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the SCAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2020.4.0). Although the Architectural Coatings phase result in an exceedance of significant thresholds, the new structures will be transported and assembled on the project site making the air emissions during this phase insignificant. As shown in Table 3-1, relevant daily construction emissions will not exceed the SCAQMD significance thresholds.

**Table 3-1**  
**Estimated Daily Construction Emissions**

<b>Construction Phase</b>	<b>ROG</b>	<b>NOx</b>	<b>CO</b>	<b>SO2</b>	<b>PM10</b>	<b>PM2.5</b>
Site Preparation (on-site)	1.38	15.67	10.05	0.02	3.19	0.83
Site Preparation (off-site)	0.03	0.02	0.26	--	0.07	0.02
<b>Total Site Preparation</b>	<b>1.41</b>	<b>15.69</b>	<b>10.31</b>	<b>0.02</b>	<b>3.26</b>	<b>0.85</b>
Grading (on-site)	1.54	16.98	9.22	0.02	8.06	4.13
Grading (off-site)	0.04	0.02	0.32	--	0.08	0.02
<b>Total Grading</b>	<b>1.58</b>	<b>17.00</b>	<b>9.54</b>	<b>0.02</b>	<b>8.14</b>	<b>4.15</b>
Building Construction (on-site)	1.85	14.60	14.35	0.02	0.70	0.67
Building Construction (off-site)	0.23	0.93	1.93	--	0.54	0.16
<b>Total Building Construction</b>	<b>2.08</b>	<b>15.53</b>	<b>16.28</b>	<b>0.02</b>	<b>1.24</b>	<b>0.83</b>
Paving (on-site)	0.91	8.61	11.68	0.02	0.43	0.40
Paving (off-site)	0.05	0.03	0.44	--	0.12	0.03
<b>Total Paving</b>	<b>0.96</b>	<b>8.64</b>	<b>12.12</b>	<b>0.02</b>	<b>0.55</b>	<b>0.43</b>
Architectural Coating (on-site)	235.15	1.30	1.81	--	0.07	0.07
Architectural Coating (off-site)	0.04	0.02	0.29	--	0.08	0.02
<b>Total Architectural Coating</b>	<b>235.19</b>	<b>1.32</b>	<b>2.10</b>	<b>--</b>	<b>0.15</b>	<b>0.09</b>
<b>Maximum Daily Emissions</b>	<b>235.19</b>	<b>17.01</b>	<b>16.28</b>	<b>0.03</b>	<b>8.14</b>	<b>4.15</b>
<b>Daily Thresholds</b>	<b>75</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod V.2020.4.0



Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEMod V.2020.4.0 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD daily emissions thresholds.

**Table 3-2**  
**Estimated Operational Emissions in lbs./day**

<b>Emission Source</b>	<b>ROG</b>	<b>NOx</b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Area-wide (lbs./day)	4.33	0.03	1.99	--	0.26	0.26
Energy (lbs./day)	--	0.06	0.05	--	--	--
Mobile (lbs./day)	0.73	0.92	6.23	0.01	1.19	0.32
<b>Total (lbs./day)</b>	<b>5.07</b>	<b>1.01</b>	<b>8.27</b>	<b>0.01</b>	<b>1.46</b>	<b>0.59</b>
<b>Daily Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod V.2020.4.0.

The analysis presented in Tables 3-1 and 3-2 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3-1 and 3-2, the impacts are considered to be less than significant. In addition, the SCAQMD Rule Book contains numerous regulations governing various activities undertaken within the district. Among these regulations is Rule 403.2 – Fugitive Dust Control for the South Coast Planning Area, which was adopted in 1996 for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the district. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes.<sup>3</sup> Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant.

**C. Would the project expose sensitive receptors to substantial pollutant concentrations? • No Impact.**

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. The nearest sensitive receptor is Canyon Ridge High School and the nearby single-family homes. These sensitive receptors are located approximately 3,000 feet (0.57 miles) east of the project site. As a result, no impacts will occur.

**D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? • No Impact.**

The SCAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.<sup>32</sup> Given the nature of the intended use (a self-storage use), no operational impacts related to odors are anticipated with the proposed project.

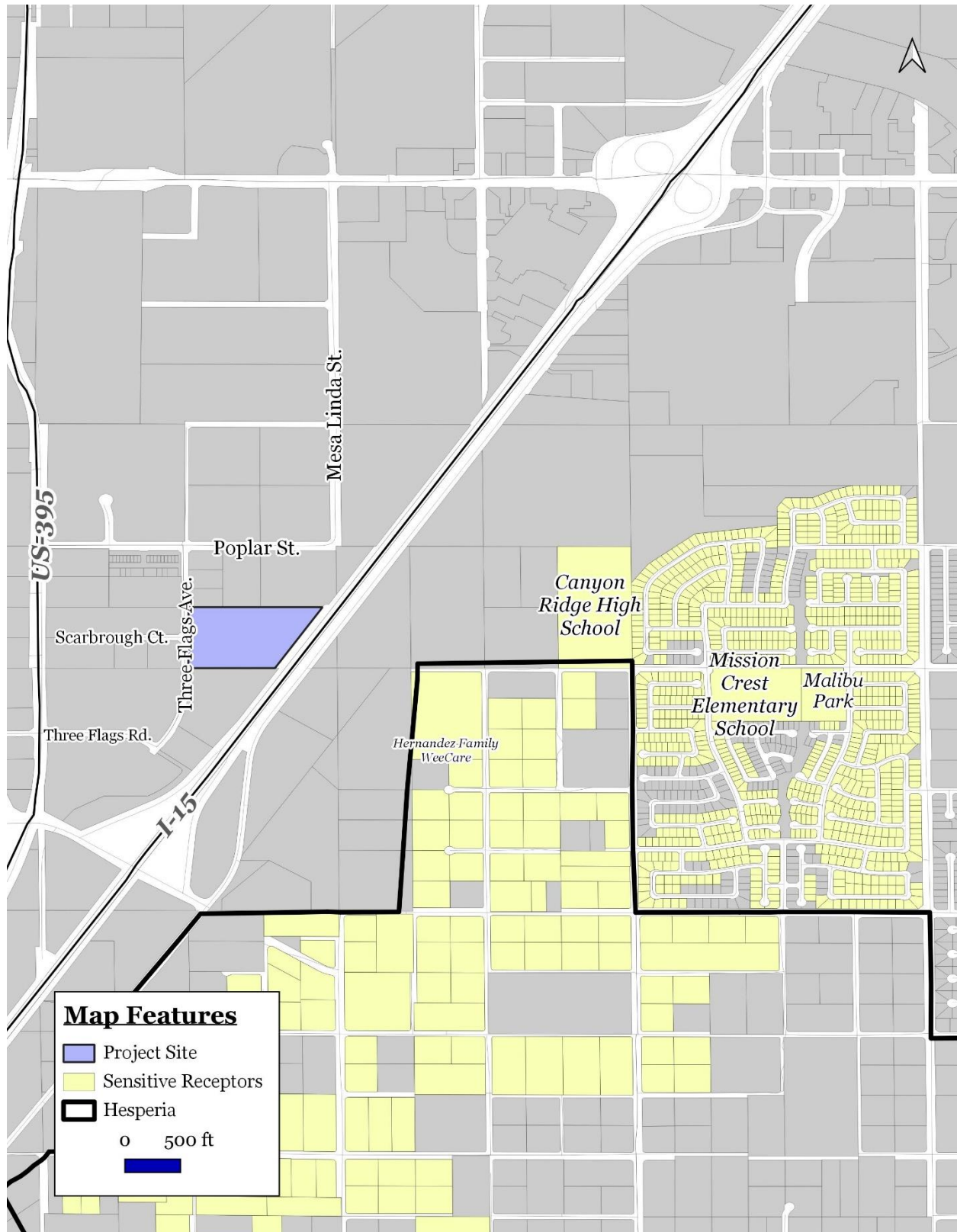
All truck drivers visiting the site must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes. Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Furthermore, adherence to SCAQMD Rule 402 Nuisance Odors will minimize odors generated during daily activities. Adherence to the existing regulations governing “nuisance odors” will reduce potential impacts to levels that are less than significant.

## **MITIGATION MEASURES**

The analysis of air quality impacts indicated that the projected emissions would be below the SCAQMD’s thresholds of significance. As a result, no mitigation would be required.

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<sup>32</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.



**EXHIBIT 3-2**  
**SENSITIVE RECEPTORS MAP**  
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

## BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✗		
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✗
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?				✗
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 life corridors, or impede the use of native wildlife nursery sites?				✗
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✗		
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✗

## ANALYSIS OF ENVIRONMENTAL IMPACTS

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

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 40,415 square feet would be landscaped.<sup>33</sup>

Biological surveys were conducted for the site which has been previously cleared but harbors a sparse variety of native and non-native vegetation. Plants that were observed included Joshua trees (*Yucca brevifolia*), rubber rabbitbrush (*Ericameria nauseosa*), California buckwheat (*Eriogonum fasciculatum*), kelch grass (*Schismus barbatus*), and sugarberry (*Celtis Laevigata*). Table 1 of the Biological Study provides

<sup>33</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

a list of all plant species observed during the field investigations. As part of the environmental process, California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) data sources were reviewed. Following the data review, surveys were performed on the site on December 16, 2021, during which the biological resources on the site and in the surrounding areas were documented by biologists from RCA Associates, Inc. As part of the surveys, the property and adjoining areas were evaluated for the presence of native habitats which may support populations of sensitive wildlife species. The property was also evaluated for the presence of sensitive habitats including wetlands, vernal pools, riparian habitats, and jurisdictional areas.<sup>34</sup>

No special status wildlife species were observed on the property; however, numerous Joshua trees, which are listed as a State threatened species, are present on the site. A comprehensive survey of the Joshua trees was conducted. Due to the presence of Joshua trees on the site, an Incidental Take Permit (ITP) will be required from CDFW prior to the start of any ground disturbance activities if any Joshua trees (living or dead) will be impacted by development activities. Focused surveys were also conducted for both the desert tortoise and burrowing owl. Based on data from USFWS, CDFW, and a search of the California Natural Diversity Database (CNDDDB, 2021), desert tortoises and burrowing owls have been documented within approximately five miles southwest of the property.<sup>35</sup>

The site is not expected to support a variety of wildlife species on the site due to the lack of vegetation and having been previously graded. No mammals were observed on site, although mammals which are expected to inhabit the site include jackrabbits (*Lepus californicus*), desert cottontails (*Sylvilagus auduboni*), and Antelope ground squirrel (*Ammospermophilus leucurus*). Coyote (*Canis latrans*) scats were observed on the site, indicating coyotes utilize the site during hunting activities. Birds observed included ravens (*Corvus corax*), house finch (*Carpodacus mexicanus*), and European starling (*Sturnus vulgaris*). Section 5.0 provides a more detailed discussion of the various species observed during the surveys and Table 2 Appendix A) provides a list of all avian species observed. No reptiles were observed during the field investigation; however, desert spiny lizard (*Sceloporus magister*) and western whiptail lizard (*Cnemidophorus tigris*) are common in the area and likely inhabit the site.<sup>36</sup>

No federal listed species were observed on site during the field investigations including the Mohave ground squirrel and desert tortoise. In addition, there are no documented observations of these species either on the site or in the immediate area (CNDDDB, 2021). The site is not expected to support populations of the desert tortoise based on the absence of any tortoise sign (e.g., burrows, scats, tracks, etc.), and although suitable habitat is present on site, the probability of the species inhabiting the site is very low. In addition, Mohave ground squirrels are unlikely to inhabit the site given the very low population levels in the area; although, CDFW may require more comprehensive surveys to definitely determine the presence or absence of the species. As per CDFW protocol, the burrowing owl survey results are valid for only 30 days; therefore, CDFW will require a 30-day pre-construction survey be performed prior to any clearing/grading activities to determine if owls have moved on to the site since the December 16, 2021, surveys.

Future development activities are expected to result in the removal of vegetation from the project site; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be minimal; however, impacts to the Joshua trees on the site will be considered significant given the recently listing of the species by the State of California as a “threatened species.” The

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<sup>34</sup> RCA Associates, Inc. *General Biological Resources Assessments*. Report dated December 22, 2021.

<sup>35</sup> Ibid.

<sup>36</sup> Ibid.

following mitigation measures are recommended:

1. Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code may need to be conducted prior to the commencement of future ground disturbance.
  - a. Appropriate survey methods and time frames shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.
  - b. Pre-construction surveys shall encompass all areas within the potential footprint of disturbance for the project, as well as a reasonable buffer around these areas.
2. A comprehensive survey and evaluation of the Joshua trees on the site will need to be conducted and preparation of a Protected Plant Plan. The report shall identify methods, locations, and criteria for transplanting those trees that would be removed prior to ground disturbance activities and Project construction.

If any other sensitive species are observed on the property during future activities, CDFW and USFWS (as applicable) should be contacted to discuss specific mitigation measures which may be required for the individual species. CDFW and USFWS are the only agencies which can grant authorization for the “take” of any sensitive species and can approve the implementation of any applicable mitigation measures.

**B.** *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?* • No Impact.

According to the United States Fish and Wildlife Service and the results of the site visits, there are no wetland or migratory bird nesting areas located within the project site. The site in its entirety is disturbed. In addition, there is no riparian habitat located on-site or in the surrounding areas.<sup>18</sup> No offsite wetland or migratory bird nesting areas will be affected by the proposed development since all development will be confined to the project site. As a result, no impacts are anticipated.

**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?* • No Impact.

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.<sup>19</sup> The site in its entirety is undeveloped and undisturbed. As a result, no impacts are anticipated.

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<sup>19</sup> RCA Associates, Inc. *General Biological Resources Assessments*. Report dated December 22, 2021.

- 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 life corridors, or impede the use of native wildlife nursery sites? • No Impact.*

The site's utility as a habitat and a migration corridor is constrained by the presence of an adjacent roadway and the development that is present in the neighboring areas. As a result, no impacts are anticipated.

- 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 with Mitigation.*

Current conditions on the property include a recently graded parcel that has been cleared of all vegetation with the exception of Joshua Trees. Amongst the Joshua trees that remain a ruderal plant community has begun to grow back. The minimal biological resources on the site consist of a desert scrub community typical of the area with Joshua trees (*Yucca brevifolia*), Russian thistle (*Kali tragus*), rubber rabbitbrush (*Ericameria nauseosa*), California buckwheat (*Eriogonum fasciculatum*), western tansymustard (*Descurainia pinnata*), and cheatgrass (*Bromus tectorum*) observed on the site.<sup>37</sup>

There are 11 Joshua trees located on the property and 1 of the trees are suitable for relocation/transplanting. This conclusion was based on: (1) trees which were one foot or greater in height and less than twelve feet tall (approximate); (2) in good health; (3), two branches or less; (4) density of trees (i.e., no clonal trees); (5) no exposed roots; (6) and trees that are not leaning over excessively. The majority of the Joshua trees which were not suitable for relocation are dead and lying on the ground.

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2021. Therefore, any attempt to remove the Joshua tree from its current position will require an Incidental Take Permit (ITP). The City of Hesperia's Municipal Code (Chapter 16.24.110) instructs to follow the County of San Bernardino's ordinance (88.01.060), which requires preservation of Joshua trees given their importance in the desert community. A qualified City-approved biologist or arborist should be retained to conduct any future relocation/transplanting activities and should follow the protocol of the County's Municipal Code (Appendix B: Chapter 88.01.060). The following criteria will be utilized by the contractor when conducting any future transplanting activities.<sup>38</sup>

- A. The Joshua trees will be retained in place or replanted somewhere on the site where they can remain in perpetuity or will be transplanted to an off-site area approved by the city where they can remain in perpetuity. Joshua trees which are deemed not suitable for transplanting will be cut-up and discarded as per City requirements.
- B. Earthen berms will be created around each tree by the biologist prior to excavation and the trees will be watered approximately one week before transplanting. Watering the trees prior to excavation will help make excavation easier, ensure the root ball will hold together, and minimize stress to the tree.
- C. Each tree will be moved to a pre-selected location which has already been excavated and will be placed and oriented in the same direction as their original direction. The hole will be backfilled with

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<sup>37</sup> RCA Associates, Inc. *Protected Plant Preservation Plan*. Report dated December 22, 2021.

<sup>38</sup> Ibid.

native soil, and the transplanted tree will be immediately watered. A numbered metal tag was placed on the north side of the trees and the trees were also flagged with surveyor's flagging. The biologist will develop a watering regimen to ensure the survival of the transplanted trees. The watering regimen will be based upon the needs of the trees and the local precipitation.

The above mitigation will reduce the impacts to levels that are less than significant.

- F.** *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*
- *No Impact.*

The proposed project's implementation would not be in conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. As a result, no impacts are anticipated.

## **MITIGATION MEASURES**

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.

*Biological Resources Mitigation Measure No. 1.* Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code may need to be conducted prior to the commencement of future ground disturbance.

- a. Appropriate survey methods and time frames shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.
- b. Pre-construction surveys shall encompass all areas within the potential footprint of disturbance for the project, as well as a reasonable buffer around these areas.

*Biological Resources Mitigation Measure No.2.* A comprehensive survey and evaluation of the Joshua trees on the site will need to be conducted and preparation of a Protected Plant Plan. The report shall identify methods, locations, and criteria for transplanting those trees that would be removed prior to ground disturbance activities and Project construction.

The following criteria will be utilized by the contractor when conducting any future transplanting activities.<sup>39</sup>

*Biological Resources Mitigation Measure No.3.* The Joshua trees will be retained in place or replanted somewhere on the site where they can remain in perpetuity or will be transplanted to an off-site area

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<sup>39</sup> RCA Associates, Inc. *Protected Plant Preservation Plan*. Report dated December 22, 2021.



approved by the city where they can remain in perpetuity. Joshua trees which are deemed not suitable for transplanting will be cut-up and discarded as per City requirements.

*Biological Resources Mitigation Measure No. 4.* Earthen berms will be created around each tree by the biologist prior to excavation and the trees will be watered approximately one week before transplanting. Watering the trees prior to excavation will help make excavation easier, ensure the root ball will hold together, and minimize stress to the tree.

*Biological Resources Mitigation Measure No. 5.* Each tree will be moved to a pre-selected location which has already been excavated and will be placed and oriented in the same direction as their original direction. The hole will be backfilled with native soil, and the transplanted tree will be immediately watered. As noted in Section 3.0, a numbered metal tag was placed on the north side of the trees and the trees were also flagged with surveyor's flagging. The biologist will develop a watering regimen to ensure the survival of the transplanted trees. The watering regimen will be based upon the needs of the trees and the local precipitation.

## CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				✗
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?		✗		
C. Would the project disturb any human remains, including those interred outside of formal cemeteries?			✗	

## ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines? • No Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>40</sup>

Current conditions on the property include a recently graded parcel that has been cleared of all vegetation with the exception of Joshua Trees. Amongst the Joshua trees that remain a ruderal plant community has begun to grow back. The minimal biological resources on the site consist of a desert scrub community typical of the area with Joshua trees (*Yucca brevifolia*), Russian thistle (*Kali tragus*), rubber rabbitbrush (*Ericameria nauseosa*), California buckwheat (*Eriogonum fasciculatum*), western tansymustard (*Descurainia pinnata*), and cheatgrass (*Bromus tectorum*) observed on the site.<sup>41</sup>

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a

<sup>40</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>41</sup> RCA Associates, Inc. *Protected Plant Preservation Plan*. Report dated December 22, 2021.

property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.<sup>42</sup>

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<sup>42</sup> U. S. Department of the Interior, National Park Service. National Register of Historic Places. <http://nrhp.focus.nps.gov>. 2010.

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic resources were listed within the City of Hesperia.<sup>43</sup>

Historic resources are those that were developed after the Spanish entered California in 1769 and are at least 45 years old at the time of analysis. The majority of existing historic resources in the Planning Area consist of historic transportation routes, roads, railways of various widths and lengths and older houses and buildings. Several important routes include: the Mojave Trail/Road, the Mormon Trail, the National Old Trails Highway, and the Spanish Trail. Additional historic sites exhibit the remnants of historic buildings and/or ranch complexes, such as foundations. These historic resources consist of buildings or linear features more than 45 years of age. Many of the known historic sites have undergone the minimum level of recordation, which consists of a site form (also known as a DPR523 form set) on file at the AIC.

The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).<sup>44</sup> The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

**B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? • Less than Significant Impact with Mitigation.**

The project site has been graded and disturbed. Although, the proposed project would not cause a substantial adverse change in the significance of known archaeological resource pursuant to CEQA Guidelines § 15064.5 or an identified tribal cultural resource pursuant to PRC §21082.3, there is a potential for project-related construction to impact unknown or previously unrecorded archaeological resources. For this reason, Mitigation Measures are proposed in the event that cultural resources are inadvertently encountered during excavation activities. No signs of human habitation nor any cemeteries are apparent within or near the project, and no signs of development on the parcel appear on any historic aerial map reviewed, nor on later USGS maps. Since it is possible that previously unrecognized resources could exist at the site, the proposed project would be required to adhere to the following mitigation measures:

- Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Hesperia that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.
- The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below

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<sup>43</sup> U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed August 20, 2021.

<sup>44</sup> California Department of Parks and Recreation. *California Historical Resources*. Website accessed on August 20, 2021.

ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

- Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.
- A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Hesperia prior to building final.

The aforementioned mitigation will reduce the impacts to levels that are less than significant.

- C. *Would the project disturb any human remains, including those interred outside of formal cemeteries?***
- *Less than Significant Impact.*

There are no dedicated cemeteries located in the vicinity of the project site.<sup>45</sup> The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

“A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.”

Additionally, Section 5097.98 of the Public Resources Code states:

“In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have

been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.”

Adherence to the aforementioned standard condition will ensure potential impacts remain at levels that are less than significant.

## **MITIGATION MEASURES**

The following mitigation measures will be required to address potential cultural resources impacts:

*Cultural Resources Mitigation Measure No. 1.* Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Hesperia that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

*Cultural Resources Mitigation Measure No. 2.* The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

*Cultural Resources Mitigation Measure No. 3.* Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

*Cultural Resources Mitigation Measure No. 4.* A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Hesperia prior to building final.

## ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?		✗		
B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✗	

### ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? • Less than Significant Impact with Mitigation.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage.<sup>46</sup>

The proposed project would consume approximately 1,279 kWh of electricity on a daily basis. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. The project Applicant will be required to implement the following mitigation measures as a means to reduce electrical consumption:

- The use of glass or translucent plastic materials on building roof and gables for daylight.

In addition, since some operations and security functions may be carried out during non-daylight hours, an additional mitigation measure is suggested to reduce energy consumption during those times.

- The use of motion activated lighting in the storage units to reduce energy use at night.

**B.** *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? • Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new

<sup>46</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.



buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. As a result, the potential impacts will be less than significant.

## **MITIGATION MEASURES**

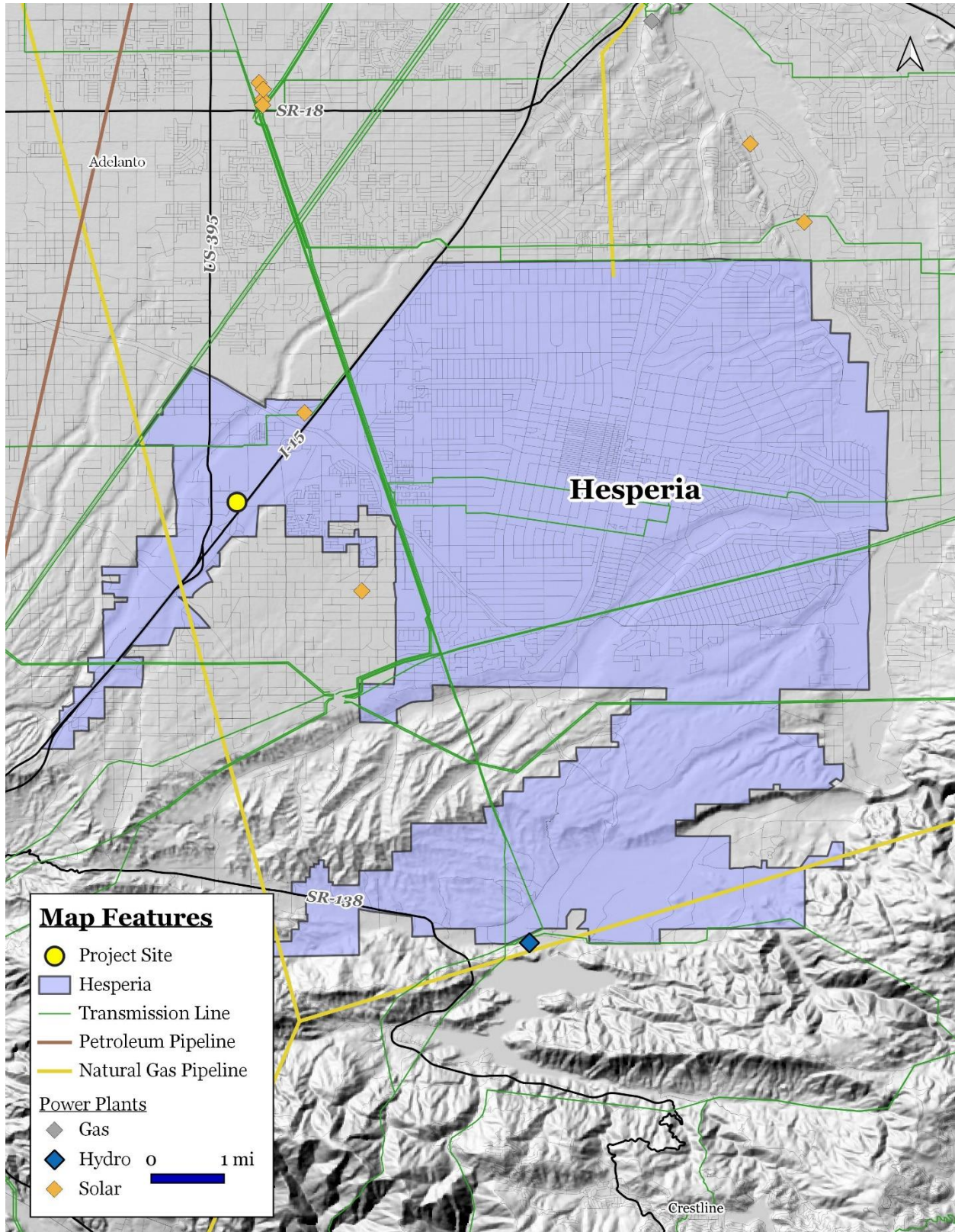
The analysis determined that the following mitigation measures will be required to reduce potential energy consumption:

*Energy Mitigation Measure No. 1.* The project must employ, as much as possible, the use of glass or translucent plastic materials on building roof and gables to allow natural daylight in work areas.

Since some operations and security functions may be carried out during non-daylight hours, an additional mitigation measure is suggested to reduce energy consumption during those times.

*Energy Mitigation Measure No. 2.* The project must use motion activated lighting in the storage units to reduce energy use at night.

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## EXHIBIT 3-3 ENERGY MAP

SOURCE: CALIFORNIA ENERGY COMMISSION

## GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?			✗	
<b>B.</b> Would the project result in substantial soil erosion or the loss of topsoil?			✗	
<b>C.</b> 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?			✗	
<b>D.</b> Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property?			✗	
<b>E.</b> 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?				✗
<b>F.</b> Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✗

## ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides? • Less than Significant Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the

north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>47</sup>

The City of Hesperia is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Hesperia is not on the list.<sup>48</sup> The nearest significant active fault zones are the San Andreas fault zone (North Frontal) and the Cleghorn fault zone, which are approximately 10.5.<sup>49</sup>

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is not located in a liquefaction zone.<sup>50</sup> According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. As a result, the potential impacts regarding liquefaction and landslides are less than significant.

**B. *Would the project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.***

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Hesperia, Cajon, and Wrightwood associations consist of moderate to fine and well drained soils. Slopes range from 0 to 2 percent.<sup>51</sup>

The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, a large portion of the project site would be paved over or landscaped. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination

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<sup>47</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>48</sup> California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010*.

<sup>49</sup> California Department of Conservation. *The Helendale Fault*.  
[http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/262/FER\\_262\\_Report\\_20160610.pdf](http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/262/FER_262_Report_20160610.pdf).

<sup>50</sup> San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

<sup>51</sup> UC Davis. *SoilWeb*. Website accessed August 21, 2021.

System (NPDES) stormwater permitting program. Prior to initiating construction, contractors must obtain coverage under a NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). The County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. As a result, the impacts will be less than significant.

- C.** *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? • Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.<sup>28</sup> The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. The proposed project site is located on a 4.5-acre (193,308 square-foot) parcel that is currently vacant and undisturbed. As a result, the potential impacts will be less than significant.

- D.** *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property? • Less than Significant Impact.*

The new structures would be transported and assembled on the project site. This would minimize grading. The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Hesperia, Cajon, and Wrightwood variant soil associations.<sup>52</sup> According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.<sup>30</sup> The applicant is required to adhere to all requirements detailed by the USDA, resulting in potential impacts which will be less than significant.

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<sup>28</sup> United States Department of Agriculture, Soil Conservation Service. *Soil Survey of Riverside California – Palm Spring Area*. Report dated 1978.

<sup>52</sup> UC Davis. *SoilWeb*. Website accessed August 21, 2021.

<sup>30</sup> United States Department of Agriculture. Natural Resources Conservation Service. Website accessed August 22, 2021.

- 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.*

The proposed project would utilize existing sewer connections located on Three Flags Avenue. As a result, impacts will be no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

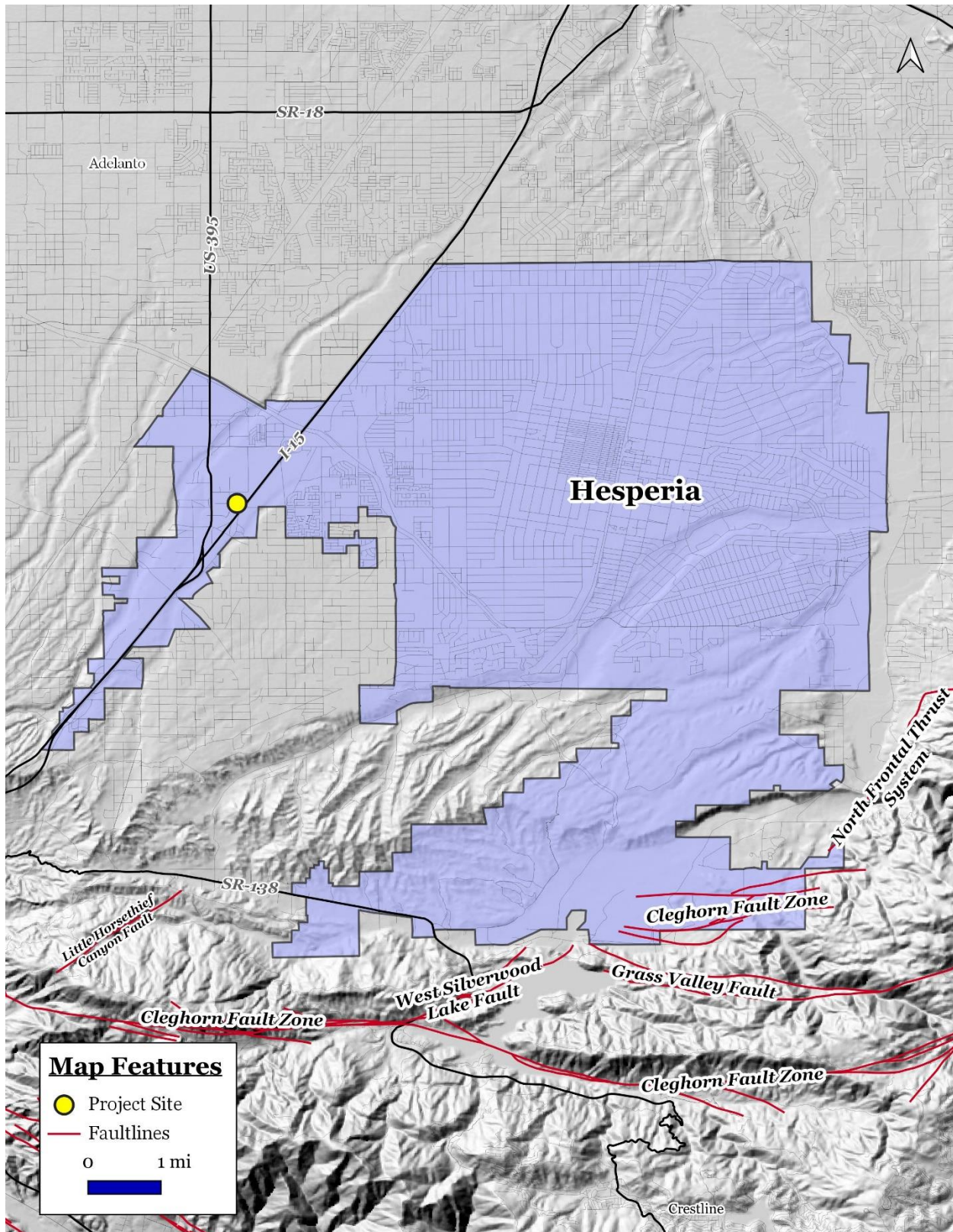
- F.** *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? • No Impact*

The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM 7786, between Hesperia and the former George Air Force Base. This locality produced a fossil specimen of meadow vole, *Microtus*. The next closest vertebrate fossil locality from these deposits is LACM 1224, west of Spring Valley Lake, which produced a specimen of fossil camel, *Camelops*. Additionally, on the western side of the Mojave River below the bluffs, an otherwise unrecorded specimen of mammoth was collected in 1961 from older Quaternary Alluvium deposits. Since no significant new excavation or grading will occur, no impacts are anticipated.

## **MITIGATION MEASURES**

The analysis determined that the proposed project will not result in significant impacts related to geological or paleontological resources and no mitigation measures are required.







## GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✗	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✗	

## ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. A total of 16 enclosed spaces and 28 covered spaces would be provided. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>53</sup>

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Carbon dioxide equivalent, or CO<sub>2</sub>E, is a term that is used for describing different greenhouses gases in a common and collective unit. The MDAQMD established the 10,000 MTCO<sub>2</sub> threshold for industrial land uses. As indicated in Table 3-4, the operational CO<sub>2</sub>E is 266 tons per year which is well below the threshold.

**Table 3-4  
Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (metric tons/year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> E
Long-Term – Area Emissions	1.48	--	--	1.53
Long-Term - Energy Emissions	67.1	--	--	67.46
Long-Term - Mobile Emissions	194.02	0.01	0.01	197.57
Long-Term - Total Emissions	262.6	0.01	0.01	266.56
Total Construction Emissions	180.39	0.03	--	182.25
Significance Threshold				<b>100,000 MTCO<sub>2</sub>E</b>

<sup>53</sup> Summit RV Storage, 8899 Three Flags Avenue, Hesperia, California. *Architectural Site Plan*. January 1, 2022.

Furthermore, as mentioned in Section 3.17, Transportation, the projected vehicle trips to and from the site will not be significant given the proposed use. All vehicle, equipment and machinery sales transactions will be completed through an online auction-style website. Very few customers will visit the project site since the new business will be closed to the general public. As a result, the potential impacts are considered to be less than significant.

**B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.***

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was adopted in March 2021. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. It is important to note that the California Department of Transportation as well as the Counties of Los Angeles and San Bernardino are engaged in an effort to construct a multi-modal transportation corridor consisting of public transit, a new freeway, and bicycle lanes known as the High Desert Corridor (HDC). The aforementioned regional program will reduce potential GHG emissions related to excessive VMTs to levels that are less than significant.

Those Partnership jurisdictions, including Hesperia, choosing to complete and adopt local Climate Action Plans (CAPs) that are consistent with the County's GHG Reduction Plan and with the prior Regional Plan Program EIR and the addendum or supplemental CEQA document prepared by SBCOG will be able to tier their future project-level CEQA analyses of GHG emissions from their CAP. In 2010, the City of Hesperia completed a CAP. The City participated in this regional effort as a study to inform their decision to update or revise their existing CAP. As part of this effort, the City of Hesperia has selected a goal to reduce its community GHG emissions to a level that is 40% below its 2020 level of GHG emissions by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost-effective through a combination of state (~70%) and local (~30%) efforts. The Pavley vehicle standards, the State's low carbon fuel standard, the RPS, and other state measures will reduce GHG emissions in Hesperia's on-road, off-road, and building energy sectors in 2030.

An additional reduction of 110,304 MTCO<sub>2</sub>e will be achieved primarily through the following local measures, in order of reductions achieved: GHG Performance Standard for Existing Development (PS-1); Water Efficiency Renovations for Existing Buildings (Water-2); and Waste Diversion and Reduction (Waste-2). Hesperia's Plan has the greatest impacts on GHG emissions in the building energy, on-road transportation, and waste sectors. The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.

## **MITIGATION MEASURES**

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

## HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✗	
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?			✗	
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?				✗
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 it create a significant hazard to the public or the environment?				✗
E. Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✗
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✗
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✗

## ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>54</sup>

<sup>54</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. In addition, all prospective tenants would be required to sign a lease/rental agreement which specifically outlines the terms and conditions imposed by the management on all prospective tenants. The storage of any hazardous materials and chemicals would be explicitly prohibited in the lease/rental agreement. As a result, less than significant impacts will occur.

**B. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*** • *Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. In addition, all prospective tenants would be required to sign a lease/rental agreement which specifically outlines the terms and conditions imposed by the management on all prospective tenants. The storage of any hazardous materials and chemicals would be explicitly prohibited in the lease/rental agreement. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Environstor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote and the impacts will be less than significant.

**C. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*** • *No Impact.*

There are no schools located within one-quarter of a mile from the project site. The nearest school is the Canyon Ridge High School located more than 3,000 feet to the east of the site. As a result, the proposed project will not create a hazard to any local school and no impacts are anticipated.

**D. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*** • *No Impact.*

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Environstor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.<sup>32</sup> Therefore, no impacts will occur.

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<sup>32</sup> CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*.  
[http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm).

- 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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?* • **No Impact.**

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport.<sup>55</sup> The nearest airport to the site is the Hesperia Airport that is located approximately 4.9 miles to the southeast. The Southern California Logistics Airport is located approximately 12.2 miles to the north of the project site.<sup>56</sup> The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any regional airports. As a result, no impacts related to this issue will occur.

- F.** *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?* • **No Impact.**

At no time will any adjacent street, including Three Flags Avenue, be completely closed to traffic during the proposed project's construction. In addition, all construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

- G.** *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?* • **No Impact.**

The project site is located in an urbanizing area along the I-15 Freeway. The project site along with the entire City is located within a "high fire hazard severity zone" and Local Responsibility Area (LRA).<sup>33</sup> However, no native vegetation is located onsite or on the surrounding properties. As a result, no impacts will result.

## **MITIGATION MEASURES**

The analysis of potential impacts related to hazards and hazardous materials indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

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<sup>55</sup> Toll-Free Airline. *Los Angeles County Public and Private Airports, California.*  
<http://www.tollfreeairline.com/california/losangeles.htm>.

<sup>56</sup> Google Maps. Website accessed August 22, 2021.

<sup>33</sup> CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County.*  
[http://frap.fire.ca.gov/webdata/maps/san\\_bernardino\\_sw/](http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/)

## HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			×	
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?			×	
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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows?			×	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				×
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? • Less than Significant Impact.*

This Initial Study analyzes the environmental impacts associated with the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>57</sup>

<sup>57</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

In its existing condition, the easterly portion of the property is developed as a truck washing facility and a truck maintenance facility. The westerly portion of the property is undeveloped graded land. Storm water sheets in a westerly direction. Existing concrete gutters intercept flows and convey them to the northeasterly corner of the site. Runoff is discharged into an existing basin. Overflows sheet across the northerly boundary of the site into the adjacent vacant land.<sup>58</sup>

Improvements include the buildings discussed previously, the proposed concrete, this proposed AC pavement, proposed landscape, proposed concrete curb, proposed concrete gutter, proposed catch basin inlets, an on-site storm drain pipe, an Aqua-Swirl hydrodynamic separator, and two proposed underground infiltration systems. The majority of the proposed development will direct storm water runoff easterly into the existing development; this is Drainage Area 1. The westerly portion of the proposed development directs storm water runoff to the northwesterly corner of the property; this is Drainage Area 2. An underground infiltration system is proposed in each drainage area to infiltrate the DCV into native soils. An Aqua Swirl hydrodynamic separator is proposed to provide treatment of runoff upstream of the infiltration system in Drainage Area 1. Overflows sheet across the northerly boundary into the adjacent vacant land as in the existing condition. The proposed development will increase the imperviousness of the property to 16%.<sup>59</sup>

The project Applicant will be required to adhere to Section 8.30 Surface and Groundwater Protection of the Municipal Code which regulates erosion and sediment control. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. As a result, the construction impacts will be less than significant.

**B.** *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? • Less than Significant Impact.*

No new direct construction related impacts to groundwater supplies, or groundwater recharge activities would occur as part of the proposed project's implementation. Water used to control fugitive dust will be transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, there would be no direct groundwater withdrawals associated with the proposed project's implementation. As a result, the impacts are considered to be less than significant.

**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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows? • Less than Significant Impact.*

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<sup>58</sup> Land Development Design Company, LLC. *Preliminary Water Quality Management Plan*. July 21, 2021.

<sup>59</sup> Ibid.



The proposed project's location will be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped though there are no stream channels or natural drainages that occupy the property. The site would be designed so the proposed hardscape surfaces (the building and paved areas) will percolate into the landscaped and other impervious areas. As a result, the potential impacts will be less than significant.

**D.** *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?* • *No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Hesperia, the proposed project site is located in a Moderate Flood Hazard zone.<sup>34</sup> Thus, properties located in this zone are located in a 500-year-old flood plain and reduced risk area. The project site presents a 0.2 percent annual chance of flood hazard but minimal flood hazard may exist. The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 65 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.<sup>60</sup> As a result, no impacts are anticipated.

**E.** *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?* • *No Impact.*

The project Applicant will be required to adhere to Section 8.30 Surface and Groundwater Protection of the Municipal Code which regulates erosion and sediment control. This Section of the City of Hesperia Municipal Code is responsible for implementing the NPDES and MS4 stormwater runoff requirements. In addition, the project's operation will not interfere with any groundwater management or recharge plan because there are no active groundwater management recharge activities on-site or in the vicinity. As a result, no impacts are anticipated.

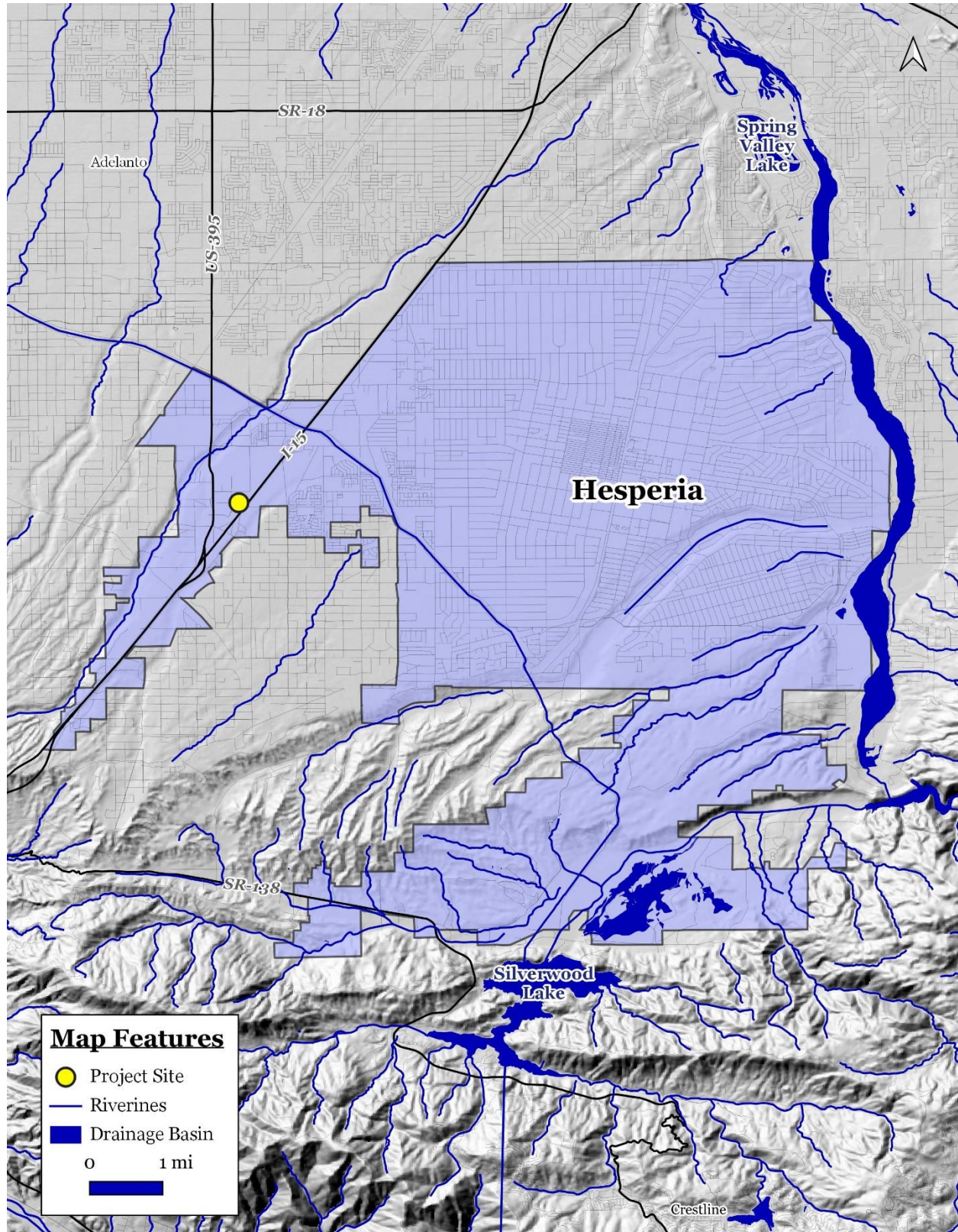
## **MITIGATION MEASURES**

As indicated previously, hydrological characteristics will not substantially change as a result of the proposed project. As a result, no mitigation is required.

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<sup>34</sup> Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2021.

<sup>60</sup> Google Earth. Website accessed August 23, 2021.



**EXHIBIT 3-5**  
**WATER RESOURCES MAP**  
SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

## LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✗
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?				✗

## ANALYSIS OF ENVIRONMENTAL IMPACTS

### A. *Would the project physically divide an established community?* • No Impact.

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>61</sup>

The property currently has a Zoning land use designation of Commercial Industrial Business Park (CIBP). Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* A private road extends along the project site's north side. Further north is the Velocity Truck Center® (8995 Three Flags Avenue). This property is zoned as Commercial Industrial Business Park (CIBP).<sup>62</sup>
- *East of the project site:* Abutting the project site to the east commercially developed land that includes Little Sister's Truck Wash® (8899 Three Flags Avenue) and Goodyear Commercial Tire and Service Center® (8893 Three Flags Avenue). To the east of these uses is the Interstate 15 Freeway. This area is zoned as Commercial Industrial Business Park (CIBP).<sup>63</sup>

<sup>61</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>62</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

<sup>63</sup> Ibid.

- *South of the project site:* A vacant lot that is being used for the storage of truck trailers is located to the south of the project site. This area is zoned Commercial Industrial Business Park (CIBP).<sup>64</sup>
- *West of the project site:* Three Flags Avenue extends along the project site's west side. A vacant lot and a commercial office use, Riverside Asset Management (12269 Scarbrough Court) is located along the east side of this roadway. This area is zoned as Commercial Industrial Business Park (CIBP).<sup>65</sup>

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur.

**B.** *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? • No Impact.*

The project site has a General Plan land use designation of Commercial/Industrial Business Park and zoning designation of CIBP. The proposed project involves the construction of a RV and self-storage business. The proposed use of the project site would be compatible with the project site's land use and zoning designations. No impact would occur. As a result, no impacts will occur.

## **MITIGATION MEASURES**

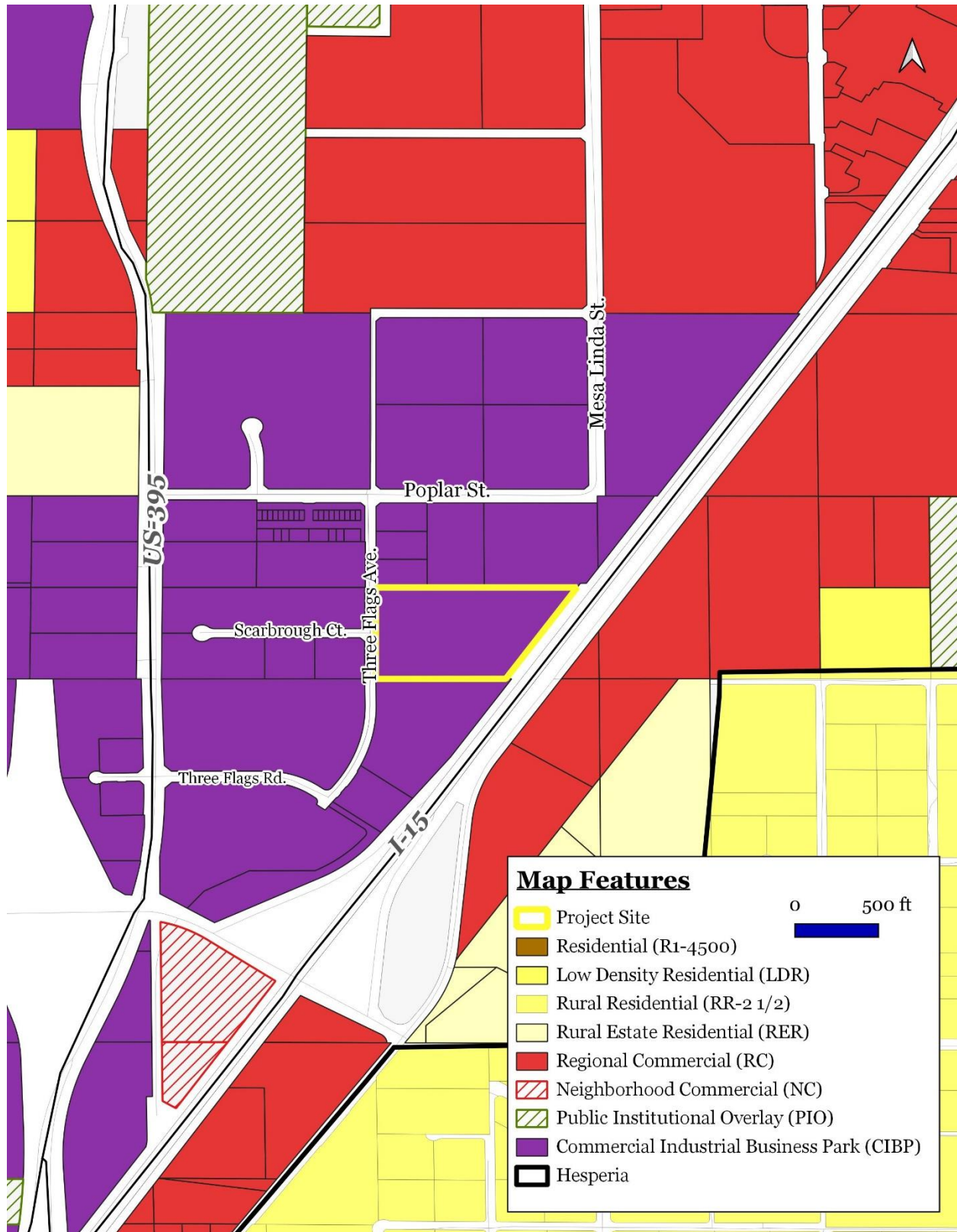
The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.

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<sup>64</sup> Google Maps and City of Hesperia Zoning Map. Website accessed on January 17, 2022.

<sup>65</sup> Ibid.





**EXHIBIT 3-6**  
**ZONING MAP**  
 SOURCE: CITY OF HESPERIA

## MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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?				×
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?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

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.*

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage.<sup>66</sup>

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.<sup>36</sup> The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about

<sup>66</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>36</sup> California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14>.

the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.

- *Mineral Resource Zone 4 (MRZ-4)*: This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities.<sup>67</sup> As indicated previously, the site is developed and there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

**B.** *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?* • *No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

## MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the approval of the proposed project and its subsequent implementation. As a result, no mitigation measures are required.

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<sup>67</sup> California Department of Conservation. *Mineral Land Classification Map for the Hesperia Quadrangle*. Map accessed August 21, 2021.



## NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			×	
B. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?			×	
C. For a project located within the vicinity of a private airstrip or- an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* • *Less than Significant Impact.*

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>68</sup>

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.<sup>38</sup>

<sup>68</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

<sup>38</sup> Bugliarello, et. al. *The Impact of Noise Pollution*, Chapter 127, 1975.

Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. The ambient noise environment is relatively high due to the site's proximity to the I-15 Freeway. Finally, there are no noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels and the potential impacts are considered to be less than significant. As a result, the impacts will be less than significant.

**B.** *Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels? • Less than Significant Impact.*






Once in operation, the proposed project will not significantly raise ground-borne noise levels. Slight increases in ground-borne noise levels could occur during the construction phase. Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernible in areas located near the construction site. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts to levels that are less than significant. Furthermore, there are no sensitive receptors or noise sensitive land uses located near the project site. As a result, the impacts will be less than significant.

**C.** *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? • No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or private airport. The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. As a result, no impacts will occur.

## **MITIGATION MEASURES**

The analysis of potential noise impacts indicated that no significant adverse impacts would result from the proposed project's construction and operation. As a result, no mitigation measures are required.

 <b>Serious Injury</b>	165	
	160	
	155	
	150	
 <b>Pain</b>	145	
	140	<i>sonic boom</i>
	135	
	130	
	125	<i>jet take off at 200 ft.</i>
	120	
 <b>Discomfort</b>	139	<i>music in night club interior</i>
	110	<i>motorcycle at 20 ft.</i>
	105	<i>power mower</i>
	100	
	95	<i>freight train at 50 ft.</i>
	90	<i>food blender</i>
 <b>Range of Typical Noise Levels</b>	85	<i>electric mixer, light rail train horn</i>
	80	
	75	
	70	<i>portable fan, roadway traffic at 50 ft.</i>
	65	
	60	<i>dishwasher, air conditioner</i>
	55	
	50	<i>normal conversation</i>
	45	<i>refrigerator, light traffic at 100 ft.</i>
	40	
	35	<i>library interior (quiet study area)</i>
	30	
 <b>Threshold of Hearing</b>	25	
	20	
	15	
	10	<i>rustling leaves</i>
	5	
	0	

## EXHIBIT 3-7 TYPICAL NOISE SOURCES AND LOUDNESS SCALE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

## POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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)?				×
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

- 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 proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage.<sup>69</sup>

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently undeveloped though it has been disturbed. The proposed use is consistent with the proposed Commercial Industrial Business Park (CIBP) zoning and general plan designations.
- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements.* The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.

<sup>69</sup> Summit RV Storage, 8899 Three Flags Avenue, Hesperia, California. *Architectural Site Plan*. January 1, 2022.

- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment (6 to 8 persons) which can be accommodated by the local labor market.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project will utilize existing roadways and infrastructure. The proposed project will not result in any unplanned growth. Therefore, no impacts will result.

**B.** *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?* • *No Impact.*

The project site is vacant though it has been graded. The proposed use is consistent with the proposed Commercial Industrial Business Park (CIBP) zoning and general plan designations. No housing units will be permitted, and none will be displaced as a result of the proposed project's implementation. Therefore, no impacts will result.

## **MITIGATION MEASURES**

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

## PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for: fire protection; police protection; schools; parks; or other public facilities?			×	

## ANALYSIS OF ENVIRONMENTAL IMPACTS

- 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 would cause significant environmental impacts, in fire protection; police protection; schools; parks; or other public facilities? • Less than Significant Impact.*

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>70</sup>

### Fire Department

The City of Hesperia and the sphere of influence are served by the San Bernardino County Fire Department. Currently there are five (5) fire stations within the City of Hesperia, Stations 301, 302, 303, 304, and 305. In addition, there are two (2) stations outside of the City, which include Stations 22 and 40. Station 301 (9430 11th Avenue) is the first response station to the project site.

The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards. Furthermore, the project will be reviewed by City and County building and fire officials to ensure adequate fire service and safety. As a

<sup>70</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

result, the potential impacts to fire protection services will be less than significant.

### **Law Enforcement**

Law enforcement services within the City are provided by the San Bernardino County Sheriff's Department which serves the community from one police station. The San Bernardino County Sheriff's Department provides police protection and crime prevention services for the City of Hesperia and its sphere of influence on a contractual basis. The Hesperia Police Department is located at 15840 Smoketree. This station is adjacent to the City Hall and Library, surrounding the Hesperia Civic Plaza. The primary potential security issues will be related to vandalism and potential burglaries during off-business hours. The project Applicant must install security cameras throughout the storage facility. Adherence to the aforementioned standard conditions and regulatory compliance measures will ensure that potential impacts remain less than significant.

### **Schools**

The Hesperia Unified School District (HUSD) is the largest school district in the high desert, covering nearly 160 square miles, serving approximately 21,000 students (K–12) on 26 separate campuses. Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. As a result, the impacts on school-related services will be less than significant.

### **Recreational Services**

The Hesperia Recreation and Park District (HRPD) is an independent special district within the County of San Bernardino. HRPD was created in 1957 to meet the recreational needs of the community and encompasses approximately 100 square miles, including the 75 square miles within the City of Hesperia and much of the Sphere of Influence. HRPD constructs and maintains parks, recreation facilities, retention basins, Landscape Maintenance Districts, streetlights, and other recreational services and programs to the community. The proposed project will not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. As a result, less than significant impacts on parks will result from the proposed project's implementation.

### **Governmental Services**

The proposed project will not create direct local population growth which could potentially create demand for other governmental service. As a result, less than significant impacts will result from the proposed project's implementation.

## **MITIGATION MEASURES**

The analysis of public service impacts indicated that no significant adverse impacts are anticipated, and no mitigation is required with the implementation of the proposed project.

## RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				×
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				×

### ANALYSIS OF ENVIRONMENTAL IMPACTS

- 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 proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet.<sup>71</sup> The Hesperia Recreation and Park District (HRPD) is an independent special district within the County of San Bernardino. HRPD was created in 1957 to meet the recreational needs of the community and encompasses approximately 100 square miles, including the 75 square miles within the City of Hesperia and much of the Sphere of Influence. HRPD constructs and maintains parks, recreation facilities, retention basins, Landscape Maintenance Districts, streetlights, and other recreational services and programs to the community. No parks are located adjacent to the site. The nearest public park is Malibu Park located approximately 4,900 feet east of the project site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts are anticipated.

- B. *Would 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.

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site and, as a result, no impacts will occur.

<sup>71</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.



## **MITIGATION MEASURES**

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

## TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			×	
<b>B.</b> Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?				×
<b>C.</b> 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)?			×	
<b>D.</b> Would the project result in inadequate emergency access?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? • Less than Significant Impact.*

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage.

A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>72</sup>

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volumes expected to be generated by the proposed project were estimated for the weekday commuter AM and PM peak hours, as well as over a 24-hour daily period, using trip generation rates provided in the Institute of Transportation Engineers' (ITE) Trip Generation Manual. The ITE document contains trip rates for a variety of land uses which have been derived based on traffic counts conducted at existing sites throughout California and the United States. The trip generation rates and forecast of the vehicular trips anticipated to be generated by the proposed project are presented in Table 3-5.

<sup>72</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

Traffic volumes expected to be generated by the proposed project were based upon rates per thousand square feet of gross floor area. ITE Land Use Code 151 (Mini-Warehouse) trip generation average rates were used to forecast the traffic volumes expected to be generated by the proposed self-storage project. The total trip generation assumed 243 trip ends (121 round trips) per day with 36 AM peak hour trips and 63 PM peak hour trips. During the weekdays, nearly 50% of the peak hour trips will be pass by trips.

**Table 3-5  
Project Trip Generation**

ITE Land Use/Project	ITE Code & Unit	Unit	Daily	AM Peak Hour Total	PM Peak Hour Total
Self-Storage (Trip Rates)	151	KSF	2.5	0.15	0.26
Proposed Generation (97,250 sq. ft.)	97K	<b>KSF</b>	<b>243</b>	<b>36</b>	<b>63</b>
Assumed 50% Pass by for Weekday Peak hour Trips				<b>18</b>	<b>31</b>

KSF = 1,000 sq. ft.

Source: Institute of Transportation Engineers (ITE) 10<sup>th</sup> Edition

The traffic volumes would be far less than the potential traffic volumes for other types of commercial land uses and development that would otherwise be permitted under the City's Zoning Ordinance for the property. As a result, the potential impacts are anticipated to be less than significant.

**B. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? • No Impact.**

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur.

**C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? • Less than Significant Impact.**

Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. As a result, the potential impacts will be less than significant.

**D. Would the project result in inadequate emergency access? • No Impact.**

The proposed project would not affect emergency access to any adjacent parcels. At no time during

construction will the adjacent public street, Three Flags Avenue, be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

## **MITIGATION MEASURES**

The analysis of potential impacts related to traffic and circulation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

## TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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?			×	
B. Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k)?			×	

## ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?, or object with cultural value to a California Native American Tribe, and that is: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? • Less than Significant Impact.*

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal

roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>73</sup> A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

**B.** *Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe 5020.1(k)? • Less than Significant Impact.*

The proposed project site is located within an area of the City that has been disturbed due to adjacent development and there is a limited likelihood that artifacts would be encountered. The proposed project’s construction would involve shallow excavation for the installation of building footings, utility lines, and other underground infrastructure. Ground disturbance would involve grading and earth-clearing activities for the installation of the grass and landscaping and other on-site improvements. In addition, the proposed project area is not located within an area that is typically associated with habitation sites, foraging areas, ceremonial sites, or burials. Nevertheless, mitigation was provided in the previous subsection. With the implementation of the mitigation measure found in subsection B of cultural resources, impacts would be reduced to levels that would be less than significant.

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<sup>73</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

## MITIGATION MEASURES

The following mitigation measures are required as a means to reduce potential tribal cultural resources impacts to levels that are less than significant:

*Tribal Cultural Resources Mitigation Measure No. 1.* Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Hesperia that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

*Tribal Cultural Resources Mitigation Measure No. 2.* The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

*Tribal Cultural Resources Mitigation Measure No. 3.* Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

*Tribal Cultural Resources Mitigation Measure No. 4.* A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Hesperia prior to building final.

## UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✗	
<b>B.</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?			✗	
<b>C.</b> 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?			✗	
<b>D.</b> 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?			✗	
<b>E.</b> Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✗

## ANALYSIS OF ENVIRONMENTAL IMPACTS

- A.** *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? • Less than Significant Impact.*

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary,



non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>74</sup>

There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently undeveloped though the site has existing electrical, sewer and water connections adjacent to the project site. The proposed project's connection can be adequately handled by the existing infrastructure. As a result, the potential impacts will be less than significant.

**B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? • Less than Significant Impact.***

The Hesperia Water District (HWD) currently maintains 18 storage reservoirs within the distribution system with a total capacity of 49.5 million gallons. The City sits above the Upper Mojave River Basin within the jurisdiction of the Mojave Water Agency, and draws its water from the Alto sub-basin, which has a capacity of 2,086,000 acre-feet. Approximately 960,000 acre-feet of stored groundwater is estimated within the basin with an additional 1,126,000 acre-feet of storage capacity available through recharge efforts. The proposed project is estimated to consume 5,256 gallons of water on a daily basis. There are existing water and sewer lines located on Three Flags Avenue. The landscaping will be drought tolerant. In addition, the project will be equipped with water efficient fixtures and hydroponics. As a result, the impacts will be less than significant.

**C. *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? • Less than Significant Impact.***

Wastewater services are provided by the Victor Valley Wastewater Reclamation Authority (VWVRA). Currently the City is served by an interceptor system that extends approximately 15 miles from the regional treatment facility (Victorville) south to I Avenue and Hercules in the City of Hesperia. The interceptor system consists of both gravity and force main pipelines, ranging in size from 6-inch to 42-inch diameters. The City's sewer system collects to the VWVRA's 3-mile interceptor that runs along the northeast boundary of the City. Sewer lines range from 3 inches up to 21-inch lines within the City. The proposed project is estimated to generate 3,017 gallons of waste water on a daily basis. The project's implementation will not create a substantial increase of existing infrastructure. As a result, the impacts are expected to be less than significant.

**D. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? • Less than Significant Impact.***

Approximately 63 percent of the solid waste generated in Hesperia is being recycled, exceeding the 50 percent requirement pursuant to the California Integrated Waste Management Act of 1989 (AB939). Currently, about 150 tons of the solid waste generated by the City per day is sent to the landfill. This remaining solid waste is placed in transfer trucks and disposed of at the Victorville Sanitary Landfill at

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<sup>74</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

18600 Stoddard Wells Road in Victorville, owned and operated by the County of San Bernardino. The proposed project is estimated to generate 890 pounds of solid waste water on a daily basis. As a result, the potential impacts will be less than significant.

**E.** *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? • No Impact.*

The proposed project, like all other development in Hesperia and San Bernardino County, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

## **MITIGATION MEASURES**

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

## WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				×
B. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, 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?				×
C. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				×
D. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				×

## ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?* • No Impact.

The proposed project involves the development of a 7.33-acre site as a RV storage and personal storage facility. The proposed project would include the construction of an office building, consisting of 1,632 square feet, and a manager's residence, consisting of 1,482 square feet. Storage buildings would be located around the site's perimeter while the RV storage would be concentrated in the center of the site. A total of 428 storage units would be provided, totaling 97,250 square feet. The RV storage would consist of both covered surface parking areas and enclosed storage. A total of 16 enclosed spaces and 28 covered spaces would be provided. A total of 12 parking spaces would be provided for patrons and employees. Of this total, 2 stalls would be reserved for ADA parking. Access (both ingress and egress) to the site would be provided by a 50-foot wide, two-way driveway connection with the east side of Three Flags Avenue. Two secondary, non-public accessways would connect to the roadways located on the north and south sides. Internal roadway widths would range from 20 feet to 50 feet. A total of 40,415 square feet would be landscaped.<sup>75</sup>

<sup>75</sup> Summit RV Storage. 8899 Three Flags Avenue. Hesperia, California. *Architectural Site Plan*. January 1, 2022.

Surface streets that will be improved at construction will serve the project site and adjacent area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts will occur.

- B.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones 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? • No Impact.*

The project site is located in the midst of an urbanized zoned area. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles northeast and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, no impacts will occur.

- C.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • No Impact.*

The project site, along with the entire city, is located in an area that is classified as a moderate fire risk severity within a Local Responsibility Area (LRA), and therefore will not require the installation of specialized infrastructure such as fire roads, fuel breaks, or emergency water sources. As a result, no impacts will occur.

- D.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

While the site is located within a high fire risk and local responsibility area, the proposed project site is located within an area classified as urban. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no impacts will occur.

## **MITIGATION MEASURES**

The analysis of wildfires impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.



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## MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				×
<b>B.</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)?				×
<b>C.</b> Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				×

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- A.** The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.
- B.** The proposed project *will not* have impacts that are individually limited, but cumulatively considerable. The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.
- C.** The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in herein, the proposed project will not result in any significant unmitigable environmental impacts.

## SECTION 4 CONCLUSIONS

### 4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

### 4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Hesperia can make the following additional findings: a mitigation monitoring and reporting program will not be required.



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## **SECTION 5 REFERENCES**

### **5.1 PREPARERS**

Blodgett Baylosis Environmental Planning  
2211 S Hacienda Boulevard, Suite 107  
Hacienda Heights, CA 91745  
(626) 336-0033

Marc Blodgett, Project Principal  
Karla Nayakarathne, Project Geographer

### **5.2 REFERENCES**

The references that were consulted have been identified using footnotes.

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## **APPENDIX A – AIR QUALITY WORKSHEETS**

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Hesperia Summit Business Center - Mojave Desert Air Basin, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Hesperia Summit Business Center  
Mojave Desert Air Basin, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Single Family Housing	1.00	Dwelling Unit	0.32	1,482.00	3
General Office Building	1.63	1000sqft	0.04	1,632.00	0
Parking Lot	14.00	Space	0.13	5,600.00	0
Unrefrigerated Warehouse-No Rail	97.25	1000sqft	2.23	97,250.00	0
Enclosed Parking Structure	28.00	Space	0.25	11,200.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.6	<b>Precipitation Freq (Days)</b>	31
<b>Climate Zone</b>	10			<b>Operational Year</b>	2023
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	390.98	<b>CH4 Intensity (lb/MWhr)</b>	0.033	<b>N2O Intensity (lb/MWhr)</b>	0.004

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics -

Land Use - manager's residence 1,482 SF

Construction Phase - Construction Characteristics

Grading - 7.33 acre site

Off-road Equipment - No Demolition

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

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Off-road Equipment -

Off-road Equipment -

Construction Off-road Equipment Mitigation -

Area Mitigation -

Water And Wastewater -

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblGrading	AcresOfGrading	4.50	7.33
tblGrading	AcresOfGrading	6.00	7.33
tblLandUse	LandUseSquareFeet	1,800.00	1,482.00
tblOffRoadEquipment	HorsePower	81.00	0.00
tblOffRoadEquipment	HorsePower	247.00	0.00
tblOffRoadEquipment	HorsePower	97.00	0.00
tblOffRoadEquipment	LoadFactor	0.73	0.00
tblOffRoadEquipment	LoadFactor	0.40	0.00
tblOffRoadEquipment	LoadFactor	0.37	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction (Maximum Daily Emission)**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	2.0861	17.0063	16.2816	0.0327	7.3998	0.7427	8.1425	3.4719	0.6852	4.1552	0.0000	3,080.863 7	3,080.863 7	0.7701	0.0678	3,112.466 4
2023	235.1914	14.4066	15.9816	0.0325	0.5314	0.6218	1.1532	0.1439	0.5958	0.7396	0.0000	3,055.822 4	3,055.822 4	0.5452	0.0649	3,086.300 8
Maximum	235.1914	17.0063	16.2816	0.0327	7.3998	0.7427	8.1425	3.4719	0.6852	4.1552	0.0000	3,080.863 7	3,080.863 7	0.7701	0.0678	3,112.466 4

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	2.0861	17.0063	16.2816	0.0327	7.3998	0.7427	8.1425	3.4719	0.6852	4.1552	0.0000	3,080.863 7	3,080.863 7	0.7701	0.0678	3,112.466 4
2023	235.1914	14.4066	15.9816	0.0325	0.5314	0.6218	1.1532	0.1439	0.5958	0.7396	0.0000	3,055.822 4	3,055.822 4	0.5452	0.0649	3,086.300 8
Maximum	235.1914	17.0063	16.2816	0.0327	7.3998	0.7427	8.1425	3.4719	0.6852	4.1552	0.0000	3,080.863 7	3,080.863 7	0.7701	0.0678	3,112.466 4

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.3317	0.0310	1.9860	3.4300e-003		0.2654	0.2654		0.2654	0.2654	27.7717	11.8264	39.5982	0.0259	2.1800e-003	40.8955
Energy	6.7800e-003	0.0612	0.0484	3.7000e-004		4.6800e-003	4.6800e-003		4.6800e-003	4.6800e-003		73.9266	73.9266	1.4200e-003	1.3600e-003	74.3659
Mobile	0.7354	0.9157	6.2359	0.0126	1.1814	0.0109	1.1922	0.3151	0.0102	0.3253		1,279.3635	1,279.3635	0.0702	0.0647	1,300.3860
<b>Total</b>	<b>5.0738</b>	<b>1.0078</b>	<b>8.2704</b>	<b>0.0164</b>	<b>1.1814</b>	<b>0.2809</b>	<b>1.4623</b>	<b>0.3151</b>	<b>0.2803</b>	<b>0.5954</b>	<b>27.7717</b>	<b>1,365.1165</b>	<b>1,392.8882</b>	<b>0.0974</b>	<b>0.0682</b>	<b>1,415.6474</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.3317	0.0310	1.9860	3.4300e-003		0.2654	0.2654		0.2654	0.2654	27.7717	11.8264	39.5982	0.0259	2.1800e-003	40.8955
Energy	6.7800e-003	0.0612	0.0484	3.7000e-004		4.6800e-003	4.6800e-003		4.6800e-003	4.6800e-003		73.9266	73.9266	1.4200e-003	1.3600e-003	74.3659
Mobile	0.7354	0.9157	6.2359	0.0126	1.1814	0.0109	1.1922	0.3151	0.0102	0.3253		1,279.3635	1,279.3635	0.0702	0.0647	1,300.3860
<b>Total</b>	<b>5.0738</b>	<b>1.0078</b>	<b>8.2704</b>	<b>0.0164</b>	<b>1.1814</b>	<b>0.2809</b>	<b>1.4623</b>	<b>0.3151</b>	<b>0.2803</b>	<b>0.5954</b>	<b>27.7717</b>	<b>1,365.1165</b>	<b>1,392.8882</b>	<b>0.0974</b>	<b>0.0682</b>	<b>1,415.6474</b>

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.0 Construction Detail

#### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	6/1/2022	6/28/2022	5	20	
2	Site Preparation	Site Preparation	6/29/2022	7/1/2022	5	3	
3	Grading	Grading	7/2/2022	7/11/2022	5	6	
4	Building Construction	Building Construction	7/12/2022	5/15/2023	5	220	
5	Paving	Paving	5/16/2023	5/29/2023	5	10	
6	Architectural Coating	Architectural Coating	5/30/2023	6/12/2023	5	10	

Acres of Grading (Site Preparation Phase): 7.33

Acres of Grading (Grading Phase): 7.33

Acres of Paving: 0.38

Residential Indoor: 3,001; Residential Outdoor: 1,000; Non-Residential Indoor: 148,323; Non-Residential Outdoor: 49,441; Striped Parking Area: 1,008 (Architectural Coating – sqft)

#### OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Demolition	Concrete/Industrial Saws	0	0.00	0	0.00
Building Construction	Cranes	1	8.00	231	0.29
Site Preparation	Graders	1	8.00	187	0.41

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Site Preparation	Scrapers	1	8.00	367	0.48
Building Construction	Forklifts	2	7.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Demolition	Rubber Tired Dozers	0	0.00	0	0.00
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	0	0.00	0	0.00
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Architectural Coating	1	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	8	49.00	19.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	0	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

Use Soil Stabilizer

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Replace Ground Cover

**3.2 Demolition - 2022**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2022**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.3 Site Preparation - 2022**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.5912	0.0000	2.5912	0.2798	0.0000	0.2798			0.0000			0.0000
Off-Road	1.3784	15.6673	10.0558	0.0245		0.5952	0.5952		0.5476	0.5476		2,375.1569	2,375.1569	0.7682		2,394.3613
<b>Total</b>	<b>1.3784</b>	<b>15.6673</b>	<b>10.0558</b>	<b>0.0245</b>	<b>2.5912</b>	<b>0.5952</b>	<b>3.1863</b>	<b>0.2798</b>	<b>0.5476</b>	<b>0.8274</b>		<b>2,375.1569</b>	<b>2,375.1569</b>	<b>0.7682</b>		<b>2,394.3613</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.3 Site Preparation - 2022**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0317	0.0182	0.2579	6.2000e-004	0.0657	3.5000e-004	0.0661	0.0174	3.2000e-004	0.0178		62.6637	62.6637	1.9200e-003	1.7500e-003	63.2322
<b>Total</b>	<b>0.0317</b>	<b>0.0182</b>	<b>0.2579</b>	<b>6.2000e-004</b>	<b>0.0657</b>	<b>3.5000e-004</b>	<b>0.0661</b>	<b>0.0174</b>	<b>3.2000e-004</b>	<b>0.0178</b>		<b>62.6637</b>	<b>62.6637</b>	<b>1.9200e-003</b>	<b>1.7500e-003</b>	<b>63.2322</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.5912	0.0000	2.5912	0.2798	0.0000	0.2798			0.0000			0.0000
Off-Road	1.3784	15.6673	10.0558	0.0245		0.5952	0.5952		0.5476	0.5476	0.0000	2,375.1569	2,375.1569	0.7682		2,394.3613
<b>Total</b>	<b>1.3784</b>	<b>15.6673</b>	<b>10.0558</b>	<b>0.0245</b>	<b>2.5912</b>	<b>0.5952</b>	<b>3.1863</b>	<b>0.2798</b>	<b>0.5476</b>	<b>0.8274</b>	<b>0.0000</b>	<b>2,375.1569</b>	<b>2,375.1569</b>	<b>0.7682</b>		<b>2,394.3613</b>

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**3.3 Site Preparation - 2022**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0317	0.0182	0.2579	6.2000e-004	0.0657	3.5000e-004	0.0661	0.0174	3.2000e-004	0.0178		62.6637	62.6637	1.9200e-003	1.7500e-003	63.2322
<b>Total</b>	<b>0.0317</b>	<b>0.0182</b>	<b>0.2579</b>	<b>6.2000e-004</b>	<b>0.0657</b>	<b>3.5000e-004</b>	<b>0.0661</b>	<b>0.0174</b>	<b>3.2000e-004</b>	<b>0.0178</b>		<b>62.6637</b>	<b>62.6637</b>	<b>1.9200e-003</b>	<b>1.7500e-003</b>	<b>63.2322</b>

**3.4 Grading - 2022**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.3177	0.0000	7.3177	3.4501	0.0000	3.4501			0.0000			0.0000
Off-Road	1.5403	16.9836	9.2202	0.0206		0.7423	0.7423		0.6829	0.6829		1,995,482.5	1,995,482.5	0.6454		2,011.6169
<b>Total</b>	<b>1.5403</b>	<b>16.9836</b>	<b>9.2202</b>	<b>0.0206</b>	<b>7.3177</b>	<b>0.7423</b>	<b>8.0599</b>	<b>3.4501</b>	<b>0.6829</b>	<b>4.1330</b>		<b>1,995,482.5</b>	<b>1,995,482.5</b>	<b>0.6454</b>		<b>2,011.6169</b>

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**3.4 Grading - 2022**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0396	0.0227	0.3224	7.7000e-004	0.0822	4.3000e-004	0.0826	0.0218	4.0000e-004	0.0222		78.3296	78.3296	2.4000e-003	2.1800e-003	79.0402
<b>Total</b>	<b>0.0396</b>	<b>0.0227</b>	<b>0.3224</b>	<b>7.7000e-004</b>	<b>0.0822</b>	<b>4.3000e-004</b>	<b>0.0826</b>	<b>0.0218</b>	<b>4.0000e-004</b>	<b>0.0222</b>		<b>78.3296</b>	<b>78.3296</b>	<b>2.4000e-003</b>	<b>2.1800e-003</b>	<b>79.0402</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.3177	0.0000	7.3177	3.4501	0.0000	3.4501			0.0000			0.0000
Off-Road	1.5403	16.9836	9.2202	0.0206		0.7423	0.7423		0.6829	0.6829	0.0000	1,995,482.5	1,995,482.5	0.6454		2,011.6169
<b>Total</b>	<b>1.5403</b>	<b>16.9836</b>	<b>9.2202</b>	<b>0.0206</b>	<b>7.3177</b>	<b>0.7423</b>	<b>8.0599</b>	<b>3.4501</b>	<b>0.6829</b>	<b>4.1330</b>	<b>0.0000</b>	<b>1,995,482.5</b>	<b>1,995,482.5</b>	<b>0.6454</b>		<b>2,011.6169</b>



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### 3.4 Grading - 2022

#### Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0396	0.0227	0.3224	7.7000e-004	0.0822	4.3000e-004	0.0826	0.0218	4.0000e-004	0.0222		78.3296	78.3296	2.4000e-003	2.1800e-003	79.0402
Total	0.0396	0.0227	0.3224	7.7000e-004	0.0822	4.3000e-004	0.0826	0.0218	4.0000e-004	0.0222		78.3296	78.3296	2.4000e-003	2.1800e-003	79.0402

### 3.5 Building Construction - 2022

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.8555	14.6040	14.3533	0.0250		0.7022	0.7022		0.6731	0.6731		2,289.2813	2,289.2813	0.4417		2,300.3230
Total	1.8555	14.6040	14.3533	0.0250		0.7022	0.7022		0.6731	0.6731		2,289.2813	2,289.2813	0.4417		2,300.3230

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**3.5 Building Construction - 2022**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0365	0.8203	0.3488	3.8700e-003	0.1289	0.0106	0.1395	0.0371	0.0101	0.0472		407.7674	407.7674	2.1500e-003	0.0571	424.8464
Worker	0.1941	0.1113	1.5795	3.8000e-003	0.4025	2.1300e-003	0.4047	0.1068	1.9600e-003	0.1087		383.8150	383.8150	0.0118	0.0107	387.2970
<b>Total</b>	<b>0.2306</b>	<b>0.9316</b>	<b>1.9283</b>	<b>7.6700e-003</b>	<b>0.5314</b>	<b>0.0127</b>	<b>0.5441</b>	<b>0.1439</b>	<b>0.0121</b>	<b>0.1560</b>		<b>791.5825</b>	<b>791.5825</b>	<b>0.0139</b>	<b>0.0678</b>	<b>812.1434</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.8555	14.6040	14.3533	0.0250		0.7022	0.7022		0.6731	0.6731	0.0000	2,289.2813	2,289.2813	0.4417		2,300.3230
<b>Total</b>	<b>1.8555</b>	<b>14.6040</b>	<b>14.3533</b>	<b>0.0250</b>		<b>0.7022</b>	<b>0.7022</b>		<b>0.6731</b>	<b>0.6731</b>	<b>0.0000</b>	<b>2,289.2813</b>	<b>2,289.2813</b>	<b>0.4417</b>		<b>2,300.3230</b>

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**3.5 Building Construction - 2022**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0365	0.8203	0.3488	3.8700e-003	0.1289	0.0106	0.1395	0.0371	0.0101	0.0472		407.7674	407.7674	2.1500e-003	0.0571	424.8464
Worker	0.1941	0.1113	1.5795	3.8000e-003	0.4025	2.1300e-003	0.4047	0.1068	1.9600e-003	0.1087		383.8150	383.8150	0.0118	0.0107	387.2970
<b>Total</b>	<b>0.2306</b>	<b>0.9316</b>	<b>1.9283</b>	<b>7.6700e-003</b>	<b>0.5314</b>	<b>0.0127</b>	<b>0.5441</b>	<b>0.1439</b>	<b>0.0121</b>	<b>0.1560</b>		<b>791.5825</b>	<b>791.5825</b>	<b>0.0139</b>	<b>0.0678</b>	<b>812.1434</b>

**3.5 Building Construction - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7136	13.6239	14.2145	0.0250		0.6136	0.6136		0.5880	0.5880		2,289.5233	2,289.5233	0.4330		2,300.3479
<b>Total</b>	<b>1.7136</b>	<b>13.6239</b>	<b>14.2145</b>	<b>0.0250</b>		<b>0.6136</b>	<b>0.6136</b>		<b>0.5880</b>	<b>0.5880</b>		<b>2,289.5233</b>	<b>2,289.5233</b>	<b>0.4330</b>		<b>2,300.3479</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.5 Building Construction - 2023**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0277	0.6845	0.3246	3.7500e-003	0.1289	6.1400e-003	0.1350	0.0371	5.8800e-003	0.0430		394.8964	394.8964	1.7000e-003	0.0551	411.3497
Worker	0.1790	0.0981	1.4425	3.6700e-003	0.4025	2.0000e-003	0.4045	0.1068	1.8400e-003	0.1086		371.4027	371.4027	0.0106	9.8500e-003	374.6032
<b>Total</b>	<b>0.2067</b>	<b>0.7826</b>	<b>1.7671</b>	<b>7.4200e-003</b>	<b>0.5314</b>	<b>8.1400e-003</b>	<b>0.5395</b>	<b>0.1439</b>	<b>7.7200e-003</b>	<b>0.1516</b>		<b>766.2991</b>	<b>766.2991</b>	<b>0.0123</b>	<b>0.0649</b>	<b>785.9529</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7136	13.6239	14.2145	0.0250		0.6136	0.6136		0.5880	0.5880	0.0000	2,289.5233	2,289.5233	0.4330		2,300.3479
<b>Total</b>	<b>1.7136</b>	<b>13.6239</b>	<b>14.2145</b>	<b>0.0250</b>		<b>0.6136</b>	<b>0.6136</b>		<b>0.5880</b>	<b>0.5880</b>	<b>0.0000</b>	<b>2,289.5233</b>	<b>2,289.5233</b>	<b>0.4330</b>		<b>2,300.3479</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.5 Building Construction - 2023**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0277	0.6845	0.3246	3.7500e-003	0.1289	6.1400e-003	0.1350	0.0371	5.8800e-003	0.0430		394.8964	394.8964	1.7000e-003	0.0551	411.3497
Worker	0.1790	0.0981	1.4425	3.6700e-003	0.4025	2.0000e-003	0.4045	0.1068	1.8400e-003	0.1086		371.4027	371.4027	0.0106	9.8500e-003	374.6032
<b>Total</b>	<b>0.2067</b>	<b>0.7826</b>	<b>1.7671</b>	<b>7.4200e-003</b>	<b>0.5314</b>	<b>8.1400e-003</b>	<b>0.5395</b>	<b>0.1439</b>	<b>7.7200e-003</b>	<b>0.1516</b>		<b>766.2991</b>	<b>766.2991</b>	<b>0.0123</b>	<b>0.0649</b>	<b>785.9529</b>

**3.6 Paving - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8902	8.6098	11.6840	0.0179		0.4338	0.4338		0.4003	0.4003		1,709.9926	1,709.9926	0.5420		1,723.5414
Paving	0.0341					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9143</b>	<b>8.6098</b>	<b>11.6840</b>	<b>0.0179</b>		<b>0.4338</b>	<b>0.4338</b>		<b>0.4003</b>	<b>0.4003</b>		<b>1,709.9926</b>	<b>1,709.9926</b>	<b>0.5420</b>		<b>1,723.5414</b>

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3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0548	0.0300	0.4416	1.1200e-003	0.1232	6.1000e-004	0.1238	0.0327	5.6000e-004	0.0333		113.6947	113.6947	3.2400e-003	3.0200e-003	114.6745
<b>Total</b>	<b>0.0548</b>	<b>0.0300</b>	<b>0.4416</b>	<b>1.1200e-003</b>	<b>0.1232</b>	<b>6.1000e-004</b>	<b>0.1238</b>	<b>0.0327</b>	<b>5.6000e-004</b>	<b>0.0333</b>		<b>113.6947</b>	<b>113.6947</b>	<b>3.2400e-003</b>	<b>3.0200e-003</b>	<b>114.6745</b>

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8902	8.6098	11.6840	0.0179		0.4338	0.4338		0.4003	0.4003	0.0000	1,709.9926	1,709.9926	0.5420		1,723.5414
Paving	0.0341					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9143</b>	<b>8.6098</b>	<b>11.6840</b>	<b>0.0179</b>		<b>0.4338</b>	<b>0.4338</b>		<b>0.4003</b>	<b>0.4003</b>	<b>0.0000</b>	<b>1,709.9926</b>	<b>1,709.9926</b>	<b>0.5420</b>		<b>1,723.5414</b>

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**3.6 Paving - 2023**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0548	0.0300	0.4416	1.1200e-003	0.1232	6.1000e-004	0.1238	0.0327	5.6000e-004	0.0333		113.6947	113.6947	3.2400e-003	3.0200e-003	114.6745
<b>Total</b>	<b>0.0548</b>	<b>0.0300</b>	<b>0.4416</b>	<b>1.1200e-003</b>	<b>0.1232</b>	<b>6.1000e-004</b>	<b>0.1238</b>	<b>0.0327</b>	<b>5.6000e-004</b>	<b>0.0333</b>		<b>113.6947</b>	<b>113.6947</b>	<b>3.2400e-003</b>	<b>3.0200e-003</b>	<b>114.6745</b>

**3.7 Architectural Coating - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	234.9632					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
<b>Total</b>	<b>235.1549</b>	<b>1.3030</b>	<b>1.8111</b>	<b>2.9700e-003</b>		<b>0.0708</b>	<b>0.0708</b>		<b>0.0708</b>	<b>0.0708</b>		<b>281.4481</b>	<b>281.4481</b>	<b>0.0168</b>		<b>281.8690</b>

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**3.7 Architectural Coating - 2023**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0365	0.0200	0.2944	7.5000e-004	0.0822	4.1000e-004	0.0826	0.0218	3.8000e-004	0.0222		75.7965	75.7965	2.1600e-003	2.0100e-003	76.4496
<b>Total</b>	<b>0.0365</b>	<b>0.0200</b>	<b>0.2944</b>	<b>7.5000e-004</b>	<b>0.0822</b>	<b>4.1000e-004</b>	<b>0.0826</b>	<b>0.0218</b>	<b>3.8000e-004</b>	<b>0.0222</b>		<b>75.7965</b>	<b>75.7965</b>	<b>2.1600e-003</b>	<b>2.0100e-003</b>	<b>76.4496</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	234.9632					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
<b>Total</b>	<b>235.1549</b>	<b>1.3030</b>	<b>1.8111</b>	<b>2.9700e-003</b>		<b>0.0708</b>	<b>0.0708</b>		<b>0.0708</b>	<b>0.0708</b>	<b>0.0000</b>	<b>281.4481</b>	<b>281.4481</b>	<b>0.0168</b>		<b>281.8690</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.7 Architectural Coating - 2023**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0365	0.0200	0.2944	7.5000e-004	0.0822	4.1000e-004	0.0826	0.0218	3.8000e-004	0.0222		75.7965	75.7965	2.1600e-003	2.0100e-003	76.4496
<b>Total</b>	<b>0.0365</b>	<b>0.0200</b>	<b>0.2944</b>	<b>7.5000e-004</b>	<b>0.0822</b>	<b>4.1000e-004</b>	<b>0.0826</b>	<b>0.0218</b>	<b>3.8000e-004</b>	<b>0.0222</b>		<b>75.7965</b>	<b>75.7965</b>	<b>2.1600e-003</b>	<b>2.0100e-003</b>	<b>76.4496</b>

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7354	0.9157	6.2359	0.0126	1.1814	0.0109	1.1922	0.3151	0.0102	0.3253		1,279,363.5	1,279,363.5	0.0702	0.0647	1,300,386.0
Unmitigated	0.7354	0.9157	6.2359	0.0126	1.1814	0.0109	1.1922	0.3151	0.0102	0.3253		1,279,363.5	1,279,363.5	0.0702	0.0647	1,300,386.0

#### 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	
	Weekday	Saturday	Sunday	Annual VMT	Mitigated Annual VMT
Enclosed Parking Structure	0.00	0.00	0.00		
General Office Building	15.90	3.61	1.14	28,755	28,755
Parking Lot	0.00	0.00	0.00		
Single Family Housing	9.44	9.54	8.55	26,490	26,490
Unrefrigerated Warehouse-No Rail	169.22	169.22	169.22	494,025	494,025
<b>Total</b>	<b>194.55</b>	<b>182.36</b>	<b>178.91</b>	<b>549,270</b>	<b>549,270</b>

#### 4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking Structure	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	77	19	4
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	40.20	19.20	40.60	86	11	3
Unrefrigerated Warehouse-No	9.50	7.30	7.30	59.00	0.00	41.00	92	5	3

#### 4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Enclosed Parking Structure	0.527784	0.055794	0.172538	0.138404	0.030772	0.007929	0.006926	0.022859	0.000522	0.000195	0.029025	0.001167	0.006083
General Office Building	0.527784	0.055794	0.172538	0.138404	0.030772	0.007929	0.006926	0.022859	0.000522	0.000195	0.029025	0.001167	0.006083
Parking Lot	0.527784	0.055794	0.172538	0.138404	0.030772	0.007929	0.006926	0.022859	0.000522	0.000195	0.029025	0.001167	0.006083
Single Family Housing	0.527784	0.055794	0.172538	0.138404	0.030772	0.007929	0.006926	0.022859	0.000522	0.000195	0.029025	0.001167	0.006083
Unrefrigerated Warehouse-No Rail	0.527784	0.055794	0.172538	0.138404	0.030772	0.007929	0.006926	0.022859	0.000522	0.000195	0.029025	0.001167	0.006083

## 5.0 Energy Detail

Historical Energy Use: N

## 5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Natural Gas Mitigated	6.7800e-003	0.0612	0.0484	3.7000e-004		4.6800e-003	4.6800e-003	4.6800e-003	4.6800e-003		73.9266	73.9266	1.4200e-003	1.3600e-003		74.3659
Natural Gas Unmitigated	6.7800e-003	0.0612	0.0484	3.7000e-004		4.6800e-003	4.6800e-003	4.6800e-003	4.6800e-003		73.9266	73.9266	1.4200e-003	1.3600e-003		74.3659

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**5.2 Energy by Land Use - Natural Gas**

**Unmitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Enclosed Parking Structure	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
General Office Building	15.3363	1.7000e-004	1.5000e-003	1.2600e-003	1.0000e-005		1.1000e-004	1.1000e-004		1.1000e-004	1.1000e-004		1.8043	1.8043	3.0000e-005	3.0000e-005	1.8150
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	77.4985	8.4000e-004	7.1400e-003	3.0400e-003	5.0000e-005		5.8000e-004	5.8000e-004		5.8000e-004	5.8000e-004		9.1175	9.1175	1.7000e-004	1.7000e-004	9.1717
Unrefrigerated Warehouse-No Rail	535.541	5.7800e-003	0.0525	0.0441	3.2000e-004		3.9900e-003	3.9900e-003		3.9900e-003	3.9900e-003		63.0048	63.0048	1.2100e-003	1.1600e-003	63.3792
<b>Total</b>		<b>6.7900e-003</b>	<b>0.0611</b>	<b>0.0484</b>	<b>3.8000e-004</b>		<b>4.6800e-003</b>	<b>4.6800e-003</b>		<b>4.6800e-003</b>	<b>4.6800e-003</b>		<b>73.9266</b>	<b>73.9266</b>	<b>1.4100e-003</b>	<b>1.3600e-003</b>	<b>74.3659</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - Natural Gas**

**Mitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Enclosed Parking Structure	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
General Office Building	0.0153363	1.7000e-004	1.5000e-003	1.2600e-003	1.0000e-005		1.1000e-004	1.1000e-004		1.1000e-004	1.1000e-004		1.8043	1.8043	3.0000e-005	3.0000e-005	1.8150
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0.0774985	8.4000e-004	7.1400e-003	3.0400e-003	5.0000e-005		5.8000e-004	5.8000e-004		5.8000e-004	5.8000e-004		9.1175	9.1175	1.7000e-004	1.7000e-004	9.1717
Unrefrigerated Warehouse-No Rail	0.535541	5.7800e-003	0.0525	0.0441	3.2000e-004		3.9900e-003	3.9900e-003		3.9900e-003	3.9900e-003		63.0048	63.0048	1.2100e-003	1.1600e-003	63.3792
<b>Total</b>		<b>6.7900e-003</b>	<b>0.0611</b>	<b>0.0484</b>	<b>3.8000e-004</b>		<b>4.6800e-003</b>	<b>4.6800e-003</b>		<b>4.6800e-003</b>	<b>4.6800e-003</b>		<b>73.9266</b>	<b>73.9266</b>	<b>1.4100e-003</b>	<b>1.3600e-003</b>	<b>74.3659</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Use Low VOC Paint - Residential Interior  
 Use Low VOC Paint - Residential Exterior  
 Use Low VOC Paint - Non-Residential Interior  
 Use Low VOC Paint - Non-Residential Exterior

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.3317	0.0310	1.9860	3.4300e-003		0.2654	0.2654		0.2654	0.2654	27.7717	11.8264	39.5982	0.0259	2.1800e-003	40.8955
Unmitigated	4.3317	0.0310	1.9860	3.4300e-003		0.2654	0.2654		0.2654	0.2654	27.7717	11.8264	39.5982	0.0259	2.1800e-003	40.8955

## 6.2 Area by SubCategory

### Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.6437					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.1537					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.5304	0.0299	1.8891	3.4200e-003		0.2649	0.2649		0.2649	0.2649	27.7717	11.6471	39.4188	0.0256	2.1800e-003	40.7105
Landscaping	3.8200e-003	1.0800e-003	0.0969	1.0000e-005		5.1000e-004	5.1000e-004		5.1000e-004	5.1000e-004		0.1794	0.1794	2.2000e-004		0.1850
<b>Total</b>	<b>4.3317</b>	<b>0.0310</b>	<b>1.9860</b>	<b>3.4300e-003</b>		<b>0.2654</b>	<b>0.2654</b>		<b>0.2654</b>	<b>0.2654</b>	<b>27.7717</b>	<b>11.8264</b>	<b>39.5982</b>	<b>0.0259</b>	<b>2.1800e-003</b>	<b>40.8955</b>

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**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.6437					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.1537					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.5304	0.0299	1.8891	3.4200e-003		0.2649	0.2649		0.2649	0.2649	27.7717	11.6471	39.4188	0.0256	2.1800e-003	40.7105
Landscaping	3.8200e-003	1.0800e-003	0.0969	1.0000e-005		5.1000e-004	5.1000e-004		5.1000e-004	5.1000e-004		0.1794	0.1794	2.2000e-004		0.1850
<b>Total</b>	<b>4.3317</b>	<b>0.0310</b>	<b>1.9860</b>	<b>3.4300e-003</b>		<b>0.2654</b>	<b>0.2654</b>		<b>0.2654</b>	<b>0.2654</b>	<b>27.7717</b>	<b>11.8264</b>	<b>39.5982</b>	<b>0.0259</b>	<b>2.1800e-003</b>	<b>40.8955</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

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## 8.0 Waste Detail

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### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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## 10.0 Stationary Equipment

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### Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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### Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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### User Defined Equipment

Equipment Type	Number
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## 11.0 Vegetation

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