Interoffice Memo

DATE: November 5, 2026 **PHONE:** 909-387-4110

FROM: **LUIS RODRIGUEZ, CONTRACT PLANNER III**
Land Use Services Department

TO: Honorable Planning Commission

SUBJECT: **AGENDA ITEM # 3: AMENDED ENVIRONMENTAL ERRATA PER CEQA GUIDELINES**

On October 30, 2026, the Planning Commission received a staff report attached to the public hearing agenda, including the CEQA Initial Study Errata in Exhibit F. An updated final version of the Errata was prepared regarding the off-site parking. The off-site parking is addressed in the staff report, findings, and conditions of approval. The amended Initial Study Errata added information regarding the off-site parking lot and concluded no further impact or mitigation and has been attached for your review.

Errata to the Initial Study / Mitigated Negative Declaration
for the
Pioneertown Soundstage Project

This section is an Errata to the Initial Study / Mitigated Negative Declaration (IS/MND) for the Pioneertown Soundstage Project. The Errata summarizes supplemental and updated information regarding the analysis contained in the IS/MND for the Pioneertown Soundstage Project. This information is provided to further reflect a good faith effort at full disclosure and provide the public, including the decision makers, with the most up-to-date and specific information known regarding the anticipated impacts which may result from the Project.

Supplemental Information

Air Quality and Greenhouse Gas
The Air Quality and Greenhouse Gas Impact Assessment utilized 10 full-time employees and 10 part-time employees in its consistency analysis related to greenhouse gas (GHG). This was a simple error, and the revised report is included as an Attachment to these responses to comments. Further, the consistency analysis found on Page 21 of Appendix 1 (revised) remains the same, and a less than significant impact has been identified. The AQ/GHG Assessment, and the IS/MND through these responses to comments as incorporated by reference herein have been revised as follows:

The GHG Consistency with SCAG RTP/SCS now states:
The project will employ approximately 10 full-time employees and 40 part-time employees and will operate Monday – Sunday from 8:00 AM – 12:00 AM (30). According to SCAG's 2024-2050 RTP/SCS, employment within San Bernardino County in 2019 is approximately 860,000 jobs with an anticipated increase to approximately 1,145,000 jobs by 2045, a growth of approximately 285,000 jobs (31). The proposed Project represents 0.018% of the anticipated increase in jobs, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or the AQMP, or result in employment growth that would substantially add to traffic congestion.

Biological Resources Assessment
The Biological Resources Assessment mistakenly noted that the event and community gathering space and hospitality Project consist of 10,377 SF on page 1 (Appendix 2). The site plan as currently proposed shows the Soundstage (6,223 SF) and its enclosed Outdoor Patio (3,258 SF), Pioneertown Gazette (831 SF), Mobile Kitchen Trailer (225 SF), Restroom Trailer (250 SF), Mobile Snack Cart (aka Mini Horse Kiosk 145 SF), Outdoor Dining Pavillion (3,024 SF), and ADA Parking (1,976 SF). This is consistent with that which was analyzed in the IS/MND and its technical appendices. Regardless, the intent in the BRA was not to insinuate the biological resource impacts would only occur within a small portion of the 1.84 acre site, it was to provide a simple description of the specific purpose of the Project (as an event and community gathering space and hospitality Project). The use of 10,377 SF was a simple error that has since been revised and simplified in a revised BRA that is included as an Attachment to these responses to comments. This correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Guidelines Section 15073.5.

Notice of Completion
The use of 12,449 SF in the NOC included the impervious area developed in association with the ADA parking. This figure has since been updated through these responses to comments to include the uses presented in the above paragraph—the site plan as currently proposed shows the Soundstage (6,223 SF) and its enclosed Outdoor Patio (3,258 SF), Pioneertown Gazette (831 SF), Mobile Kitchen Trailer (225 SF), Restroom Trailer (250 SF), Mobile Snack Cart (aka Mini Horse Kiosk 145 SF), Outdoor Dining Pavillion (3,024 SF), and ADA Parking (1,976 SF)—which were included in the analysis presented in the

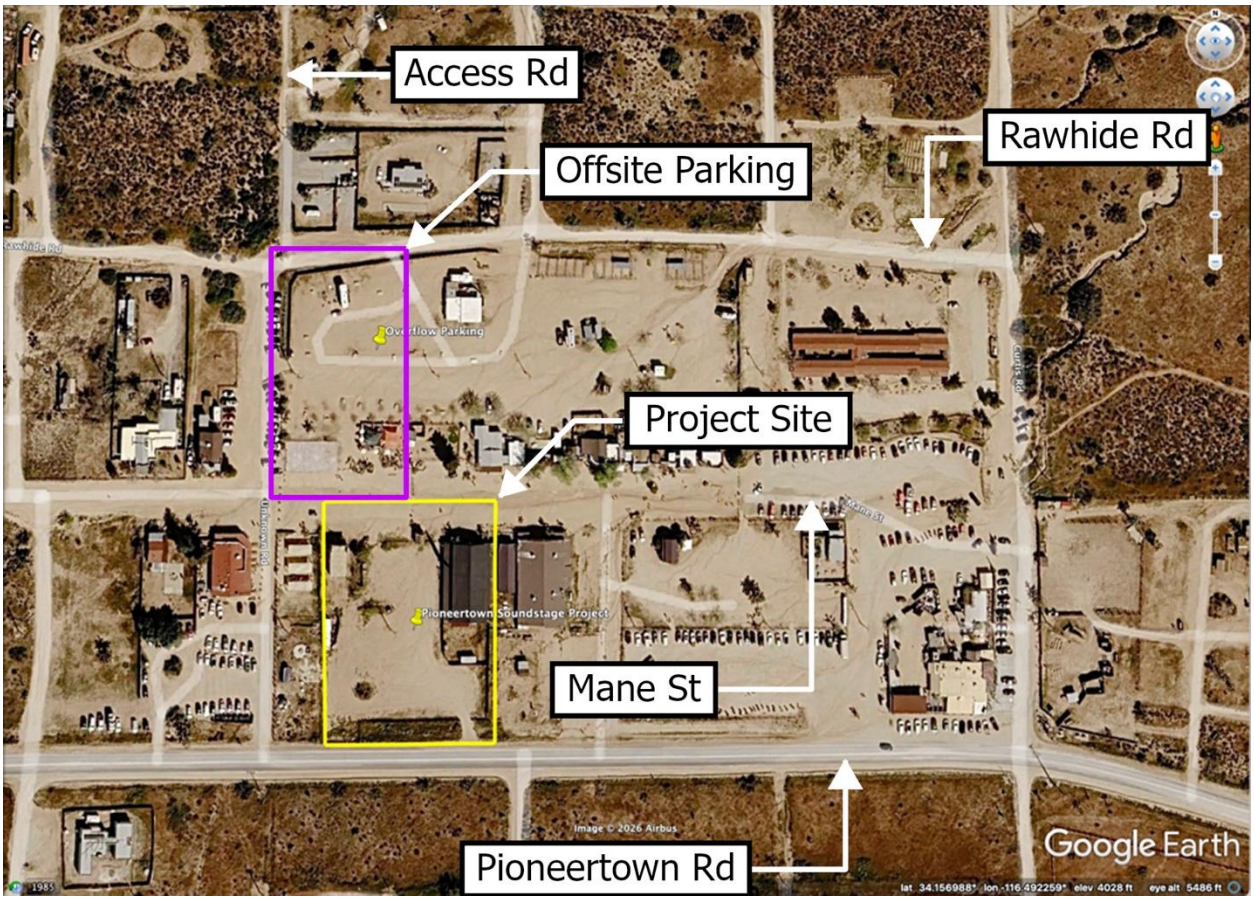
IS/MND. Thus, these corrections do not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Guidelines Section 15073.5.

The NOC also stated that there would be 40 employees. The NOC form does not specify whether the employees are part-time or full-time. There are 40 part-time employees, with 10 full-time employees planned to be supported by the full Project operation, as described in the Project Description within the IS/MND. The NOC form selected 40 as the number of part-time employees, but is corrected by this record to reflect that the number of employees found in the IS/MND Project Description is accurate (i.e. 10 full-time employees and 40 part-time employees). This correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Guidelines Section 15073.5.

Parking Area

The circulated IS/MND identified the Project site as APNs 0594-391-06, -07, and -08 and evaluated parking spaces located on the Project site. Following circulation of the IS/MND, the Applicant identified APN 0594-212-15 as the location for 63 additional parking spaces necessary to satisfy the Project's parking requirement. This Errata therefore supplements the IS/MND to identify and evaluate the proposed use of APN 0594-212-15 for Project parking.

APN 0594-212-15, a campground and parking area, is a largely unimproved earthen-covered space located between Tom Mix Road (also known as Unknown Road) to the West, continuing east to the Pioneertown Lodge property boundary, then running north to Rawhide Road and generally consisting of portions of APNs 0594-212-15, -34, and -36. Centered within the campground and parking area is a recent concrete block barbeque pit with wood picnic tables covered by an open-sided canopy of untreated wood posts with a gabled roof clad in corrugated metal.



Aerial of Pioneertown Soundstage Project with Overflow Parking Area Identified

The campground property is utilized for various activities, special events, overflow parking, and as a staging area for vendors and livestock because many of the uses and business activities located in Pioneertown are somewhat seasonal.

Parking activity at the campground, since the Applicant purchased the subject property in 2021, has been an integral feature in Pioneertown and used in support of commercial businesses, special events, and the activities associated with the historic campground. Prior to the applicant's purchase of the campground property, the site was utilized for various uses and activities and has changed ownership seven (7) times during the past 30 years. The description of these existing and historical activities is provided to describe the existing physical environmental setting and is not intended to determine or establish the legal or permitted status of any prior use of the property.

Access to the campground/parking area occurs from Curtis Road then west along Rawhide Road where there are two (2) rural drive entrances from the south side of Rawhide, the second entrance at the intersection of William S. Hart Road. Access is also provided either off of Pioneertown Road or the easterly extension of Mane Street, then north on Unknown Road (located immediately west of the subject parcels), then east on Rawhide Road to access the same two (2) rural driveways noted above. Except for Pioneertown Road all other roadways are rural roadways consisting of native compacted materials and maintained either privately or by County Special Districts.

The Applicant has identified APN 0594-212-15, an approximately 1.27-acre parcel located on the north side of Mane Street across from the Project site, as an overflow parking area for the Pioneertown

Soundstage. As shown on the Parking Layout prepared for the parcel, **Parking Site Plan** below, the overflow area would provide approximately 63 parking spaces on the existing unpaved surface, supplementing the 57 on-site parking spaces described in the IS/MND. The overflow area would be used on an as-needed basis during larger events at the Soundstage. No grading, paving, or new structures are proposed; this is a continuation of the existing site that is routinely utilized for Pioneertown Parking on an as-needed basis. The off-site parking is authorized under Development Code section 83.11.030(a) with the approval of a Site Plan Permit pursuant to Chapter 85.08, with a parking agreement additionally required to ensure the 63 spaces remain permanently available and maintained for the Project.

The off-site parking area parcel has been used by the current property owner for at least five years as overflow parking, both for activities at the Soundstage and for other activities throughout Pioneertown on an as-needed, informal basis. Its continued use for overflow parking in support of the Project therefore represents use of an existing, previously disturbed parking area within the existing environmental setting. No expansion of the existing disturbed area, grading, paving, new structures, or permanent parking-lot lighting is proposed as part of the Project. The existing physical condition and historical use of the parcel are relevant to the environmental baseline; however, this Errata separately evaluates the effects of using the parcel for the 63 Project-required parking spaces.

Use of the parcel for Project parking would not increase the maximum occupancy or overall trip generation of the Soundstage analyzed in the IS/MND but would designate where a portion of Project-generated vehicles may park. Access would continue to occur over the existing roadway network and existing entrances described above, without construction of new access roads or driveways. The additional parking area does not increase the approved attendance or number of Project-generated vehicle trips analyzed for the Soundstage but would relocate a portion of parking activity to APN 0594-212-15.

Because the parking area is located directly across Mane Street from the Project site, its use would not measurably change the length of Project-related vehicle trips, and the vehicle miles traveled (VMT) screening conclusion in Section XVII of the IS/MND is unchanged. Under State CEQA Guidelines Section 15064.3(a), a project's effect on automobile delay is not, by itself, a significant environmental impact. Vehicles using the parking area would continue to reach the parcel via Curtis Road, Rawhide Road, and Unknown Road, which are existing rural roadways that currently provide access to the campground and to the existing overflow parking use on the parcel. Use of the parking area would involve up to 63 vehicles arriving before, and departing during or after, larger Pioneertown Soundstage events, which typically occur during evening hours outside of the weekday morning and afternoon peak commute periods. These vehicles would be distributed between the two access routes and the two existing driveways on Rawhide Road. No new driveways, changes to roadway geometry, or incompatible uses would be introduced. Patrons would walk between the parking area and the Pioneertown Soundstage across Mane Street, a private, pedestrian-oriented street, and would not need to cross Pioneertown Road to access the parking area (as occurs at present). By providing designated off-street parking, the parking area reduces the potential for event patrons to park along the shoulders of Pioneertown Road, a safety concern raised in comments on the IS/MND. Because vehicles would park within the parcel rather than along the access roads, emergency access along Rawhide Road and the other access roads would not be obstructed. Access and on-site circulation for the parking area would also be subject to County review. Therefore, use of the parcel would not create a new transportation hazard or emergency access impact, and the transportation conclusions of the IS/MND remain unchanged.

The parcel has been used as overflow parking for Pioneertown Soundstage events and other Pioneertown activities under existing conditions, and the noise associated with vehicles arriving, parking, and departing at this location is part of the existing noise environment during events. Use of the parcel for Project parking would not increase the maximum occupancy of the Pioneertown Soundstage or the number of event attendees analyzed in the IS/MND, and therefore would not increase the number of attendee vehicles.

Instead, this change would designate where a portion of those vehicles would park. Parking-related noise, such as engine starts, door closures, and conversation, is short-term and intermittent. The Noise Study (**Appendix 5**) found that Project operations, including amplified music and on-site parking, would comply with the County's daytime and nighttime exterior noise standards at all modeled receptors. Further, the continued use of this site as parking for events would constitute a continuation of an existing use of the site for events. The parking noise would be no greater than that which occurs during Pioneertown events that utilize this lot for parking at present. Accordingly, use of the parcel for Project parking would not result in a new or substantially more severe noise impact, and the noise conclusions of the IS/MND remain unchanged.

The parking area and access roads are presently unpaved, and no paving or grading is proposed. Any applicable operational dust-control requirements shall continue to apply. The IS/MND (Table III-6) estimated maximum daily operational PM_{10} emissions of 7.82 pounds per day, compared to the MDAQMD threshold of 82 pounds per day. As a conservative screening estimate, fugitive dust from vehicle travel on the unpaved access roads serving the parking area was calculated using the U.S. Environmental Protection Agency (EPA) AP-42 emission factor for unpaved roads (Section 13.2.2),[1] assuming the following: 63 vehicles each traveling approximately 0.3 mile each way on unpaved roads (approximately 38 vehicle miles traveled per event day), a silt content of 10 percent, an average speed of 15 miles per hour, a dry surface moisture content of 0.2 percent, and no dust control. This calculation yields approximately 48 pounds of P_{M10} and 5 pounds of $PM_{2.5}$ per event day. Even if all of these emissions were treated as new, which is conservative because these vehicles already use the parcel and access roads under existing conditions for event parking, the total Project operational emissions would be approximately 56 pounds per day of PM_{10} and 7 pounds per day of $PM_{2.5}$, which falls below the MDAQMD thresholds of 82 and 65 pounds per day, respectively. Emissions of other pollutants (VOC, NO_X, CO, and SO_X) depend on the number and length of vehicle trips, which would not change as part of the use of the off-site parking area. Additional dust control is therefore not required to reach the less than significant conclusion. Regardless, the parking area remains subject to MDAQMD Rule 403 (Fugitive Dust), which applies independently of the Project approvals and is enforceable by the MDAQMD. Thus, the air quality conclusions of the IS/MND remain unchanged.

Additionally, no permanent lighting is proposed for the parking area. Accordingly, the Project would not introduce a new stationary source of nighttime illumination at APN 0594-212-15. Vehicle headlights would occur intermittently as vehicles enter and leave the parking area. Development Code Section 83.07.060 (Glare and Outdoor Lighting – Mountain and Desert Requirements) governs outdoor lighting fixtures. It should be noted that vehicle headlights are mobile, temporary sources of light, and, as noted in Section I(d) of the IS/MND, headlights from area roadways are an existing source of nighttime light in the Project vicinity. In this case, the continued use of this site as parking for events would constitute a continuation of an existing use of the site for events. Thus, the headlights associated with parking at this site while more frequent under the Project, would not be considered new or greater than that which occurs during Pioneertown events that utilize this lot for parking at present. Headlights associated with the parking area would occur only briefly, as vehicles arrive before and depart after larger events, and would not be directed toward any single location for an extended period. In addition, the Parking Layout shows a six-foot wood fence along the Rawhide Road frontage of the parcel, which would screen headlights from vehicles maneuvering within the parking area from properties to the north. For these reasons, headlights associated with use of the parking area would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and the aesthetics conclusions of the IS/MND remain unchanged.

[1] EPA, 2026. AP-42: Compilation of Air Emissions Factors from Stationary Sources. https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-stationary-sources (Accessed 11/03/26)

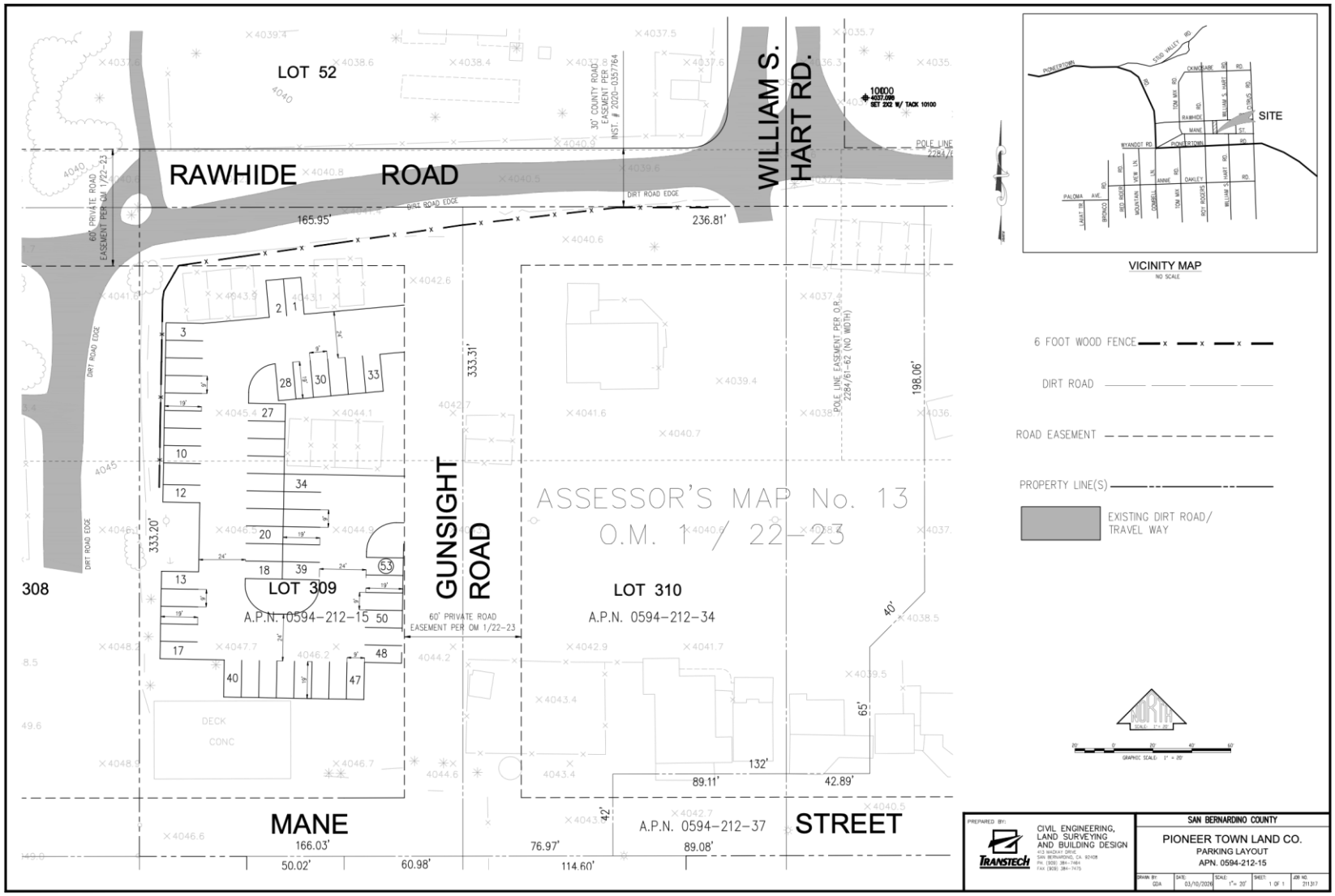
Because use of the parking area would occur within the existing disturbed footprint and no grading, paving, structures, vegetation removal, or other ground disturbance is proposed, use of the parcel would not result in new ground-disturbing impacts to biological, cultural, or tribal cultural resources or alter existing drainage conditions.

Use of the overflow parking area would be subject to the Conditions of Approval established by the County for the Project. In addition, Soundstage events would be coordinated to avoid overlapping with other large-scale events in Pioneertown so that the overflow area is available for event parking as needed. Providing a designated overflow area also reduces the potential for event-related parking along Pioneertown Road and other rural roadways.

Thus, the continued use of this parcel for overflow parking would not result in any new significant environmental effects, or a substantial increase in the severity of any effect, beyond those identified in the IS/MND and the Responses to Comments. This correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Guidelines Section 15073.5.

The Errata summarizes supplemental and updated information regarding the analysis contained in the IS/MND for the Pioneertown Soundstage Project. This information is provided to further reflect a good faith effort at full disclosure and provide the public, including the decision makers, with the most up-to-date and specific information known regarding the anticipated impacts which may result from the Project. This correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Guidelines Section 15073.5.

Thus, if the Project is adopted by the County, the current Initial Study is deemed adequate by County Staff with no changes in findings and recommendations, and in light of the record as a whole.



6 FOOT WOOD FENCE

DIRT ROAD

ROAD EASEMENT

PROPERTY LINE(S)

EXISTING DIRT ROAD/ TRAVEL WAY

NORTH

GRAPHIC SCALE: 1" = 20'

PREPARED BY:
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SAN BERNARDINO COUNTY
PIONEER TOWN LAND CO.
PARKING LAYOUT
APN. 0594-212-15

DRAWN BY:	DATE:	SCALE:	SHEET:	JOB NO.
CDA	03/10/2026	1"= 20'	1 OF 1	21137

Parking Site Plan