

Initial Study/Mitigated Negative Declaration County of San Bernardino

Desert Horizons II (PROJ-2025-00050)

**73 El Mirage Airport Rd
El Mirage, California**

Lead Agency:



County of San Bernardino Land Use Services
385 N. Arrowhead Ave.,
San Bernardino, CA 92415

Technical assistance provided by:

**LILBURN
CORPORATION**

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Lilburn Corporation
1905 Business Center Drive
San Bernardino, CA 92408

September 2025

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**SAN BERNARDINO COUNTY
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
ENVIRONMENTAL CHECKLIST FORM**

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

PROJECT LABEL

APNs:	0457-041-02, -03, and -04	USGS Quad:	Shadow Mountains – 7.5 and, Shadow Mountains SE - 7.5
Applicant:	Loren Kagan General Atomics Aeronautical Systems, Inc. 14118 Stowe Drive Bldg #A37 Poway, CA 92064	T, R, Section: Coordinates:	T06N, R07W, Sec. 11 34° 37' 20" N 117° 35'26" W
Location	73 El Mirage Airport Rd. El Mirage, San Bernardino County 92316		
Project No:	PROJ-2025-00050	Community	El Mirage
Superviso rial Rep	First Supervisorial District: Col. Paul Cook	LUC: Zone: LUC: Zone: LUC: Zone:	0457-041-02-Rural Living (RL) 0457-041-02-Rural Living (RL) 0457-041-03 General Industrial (GI) 0457-041-03 Institutional (IN) 0457-041-04 Rural Living (RL) 0457-041-04 Rural Living (RL)
Proposal:	General Atomics Aeronautical Systems is seeking a Conditional Use Permit (CUP) and Major Variance for the expansion of the 800 acre El Mirage Airfield facility on approximately 20 acres of three parcels totaling 312 acres located in El Mirage, unincorporated San Bernardino County, California	Overlays:	Biotic Resources, Desert Tortoise, Burrowing Owl

PROJECT CONTACT INFORMATION

Lead agency: County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Contact person: Kumail Raza, AICP - Contract Planner III
Phone No: (909) 387-4110 **Fax No:** (909) 387-3223
E-mail: Kumail.raza@lus.sbcounty.gov

INTRODUCTION

General Atomics Aeronautical Systems is seeking approval for a Conditional Use Permit (CUP) and Major Variance for the expansion of the 800-acre El Mirage Airfield facility. The proposal is for an aircraft assembly hangar and avionics assembly & testing with associated accessory office and support facilities (Project). The Proposed Project is located on approximately 20 acres of parcel APN: 0457-041-02, which is an approximately 77-acre parcel. It also includes approximately one acre of the adjacent parcel to the west, APN: 0457-041-03, which totals approximately 159 acres. Additionally, the approximately 77-acre parcel APN: 0457-041-04 is

incorporated into the project site. The three parcels totaling approximately 312 acres (APNs: 0457-041-02, -03, and -04) are planned to be merged as part of the project. The project site located in El Mirage, unincorporated San Bernardino County, California approximately ten miles west of the City of Adelanto (see Figure 1-*Regional Location*). More specifically the airfield is at 73 El Mirage Airport Road within the 1st Supervisorial District (see Figure 2-*Project Vicinity*). The airfield is designated Rural Living (RL) and General Industrial (GI) according to the San Bernardino County Countywide Plan/Policy Plan 2020 (Policy Plan), with zoning designations of Rural Living (RL) and Institutional (IN). The airfield opened in 1942 as a satellite field for the Victorville Army Airfield (Victorville AAF) and was used as a training facility during World War II. After the war, the field was used as a civil airfield. Since 1985 the El Mirage Field has been used by General Atomics as their unmanned air vehicle flight test center.

PROJECT DESCRIPTION

The Project is proposed to be constructed on approximately 20 acres of parcel APN: 0457-041-02, and approximately one acre for a fire lane on parcel APN: 0457-041-03. Total building square footage equals approximately 157,532 square feet to be constructed in two phases. No development or construction is proposed on parcel APN: 0457-041-04.

Phase I: Construction of a new 118,020 square foot hangar building for assembly and housing of unmanned aircraft, and a 19,512 square foot Ground Control building for training and testing systems, as well as a new parking area with up to 210 spaces (located on APN: 0475-021-02), and a 30-foot fire lane surrounding the proposed hangar and existing hangar buildings and ancillary structures (partially located on APN: 0457-021-03) (see Figure 3-*Site Plan*). Onsite wells and septic system to be approved by County Environmental Health Services (EHS) will provide water and wastewater services respectively.

Phase II: Construction of a 20,000 square foot Stockroom building with additional parking to be determined will be located on parcel with APN: 0457-041-02, south of the proposed hangar building.

The entirety of this Project is proposed to support the continued expansion of the existing El Mirage facility which has been in operation since 1985. A previous eastward expansion of the runway and addition of a 144,000 square foot hangar were approved in 2017 and 2018 respectively on the two approximately 80-acre easternmost parcels (APNs 0457-041-02 and 0457-041-04). (see Figure 3A – *Site Plan/Disturbance Area*).

Parking and Circulation:

Access to the site is provided by El Mirage Airport Road which runs in a north/south direction perpendicular to El Mirage Road to the south of the Project Site. A secondary access road for emergency use only is located on the south property line and proceeds south in a north/south direction is Tanner Road with access to El Mirage Road. A 1.5-mile road that will provide access to the Project was constructed as part of the 2017/2018 approvals. The Project Site plan provides adequate area to accommodate all parking, access requirements, and landscaping required to comply with development standards of the Development Code.

Surrounding Land Uses and Setting:

The Project Site is within unincorporated San Bernardino County approximately 10 miles west of the City of Adelanto. Land Use Zoning Districts show that two of the Project parcels are within the Rural Living (RL) zoning designation, and one is within the Institutional (IN) zoning designation. The vacant parcel to the north is zoned Resources Conservation (RC), and the parcel to the east is zoned Rural Living (RL). The parcel to the west of the Project parcels is part of the overall El

Mirage facility and contains the majority of the facility structures and a portion of the runway and is zoned Institutional (IN). The parcel to the south is vacant and is zoned RL as well. **Table 1** lists the existing land uses, Policy Plan land use category, and zoning district designations of the Project Site and surrounding parcels.

Table 1: Surrounding Land Use and Zoning

AREA	Existing Land Use	Land Use Category	Zoning Designation
Site	El Mirage Airfield	Rural Living (RL) and General Industrial (GI)	Rural Living (RL) and Institutional (IN)
North	Vacant land	Resource Land Management (RLM)	Resource Conservation (RC)
South	Vacant land and agricultural operations	Rural Living (RL)	Rural Living (RL)
East	Vacant land and agricultural operations	Rural Living (RL)	Rural Living (RL)
West	El Mirage Airfield	General Industrial (GI)	Institutional (IN)

Project Site Location, Existing Site Land Uses and Conditions

The Project is located at the terminus of El Mirage Airport Road, approximately one mile north of El Mirage Road, in the community of El Mirage, approximately ten miles west of the City of Adelanto. Road dedications along Linson Street on the south boundary, Meridian Road to the east, and Colusa Road to the north ensure adequate and necessary legal and physical access to the Project Site. The five parcels that make up the majority of the site (APNs: 0457-041-03, 0457-052-12, -13, -14, and -15) are under a Policy Plan land use of General Industrial (GI) and zoned Institutional (IN). The two easternmost parcels (APNs: 0457-041-02, and -04) of the airfield are within a Rural Living (RL) land use designation and RL zoning.

El Mirage Field is situated approximately 10 miles west of the City of Adelanto, in the western portion of the greater Victor Valley area, on southern edge of the Mojave Desert, and to the north of the San Bernardino-San Gabriel Mountain ranges. It lies near the southern rim of the El Mirage Dry Lake, which accumulates seasonal run-off from the Shadow Mountains to the north, a disjointed range characterized by two distinct ridge lines separated by broad, sloping bajadas.

The climate and environment in the area is typical of the high desert country, so named because of its relatively higher elevation than the Colorado Desert region to the southeast. The climate is marked by extremes in temperature and aridity, with summer highs reaching well over 110°F and winter lows dipping below freezing. Average annual precipitation is less than five inches, most of which occurs in winter or during occasional monsoon storms.

The majority of the overall 800-acre site is covered by the El Mirage Airfield facility. The terrain is relatively level, with elevations ranging between approximately 2,845 and 2,870 feet above mean sea level (amsl), sloping gradually to the north. Soils consist of grayish brown fine- to coarse-grained sands mixed with small rocks and gravel. The Project area of proposed disturbance consists mostly of undeveloped desert land.

Vegetation in the vicinity belongs to the Joshua Tree Woodland Plant Community, featuring creosote bushes (*Larrea tridentata*), brittlebrush (*Encelia farinosa*), and other small grasses and shrubs as well as its namesake Joshua trees (*Yucca brevifolia*). The eastern portion of the Project area contains most of the vegetation, which is dense at some locations, while the western portion has evidently been cleared of all vegetation in the past and hosts only a sparse regrowth of the typical desert grasses and shrubs.

Discretionary Approvals and Permits

In accordance with Sections 15050 and 15367 of the State CEQA Guidelines, the County is the designated Lead Agency for the Proposed Project and has principal authority and jurisdiction for CEQA actions and project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a Proposed Project and/or mitigation. Trustee Agencies are State agencies that have jurisdiction by law over natural resources affected by a Proposed Project.

ADDITIONAL APPROVAL REQUIRED BY OTHER AGENCIES

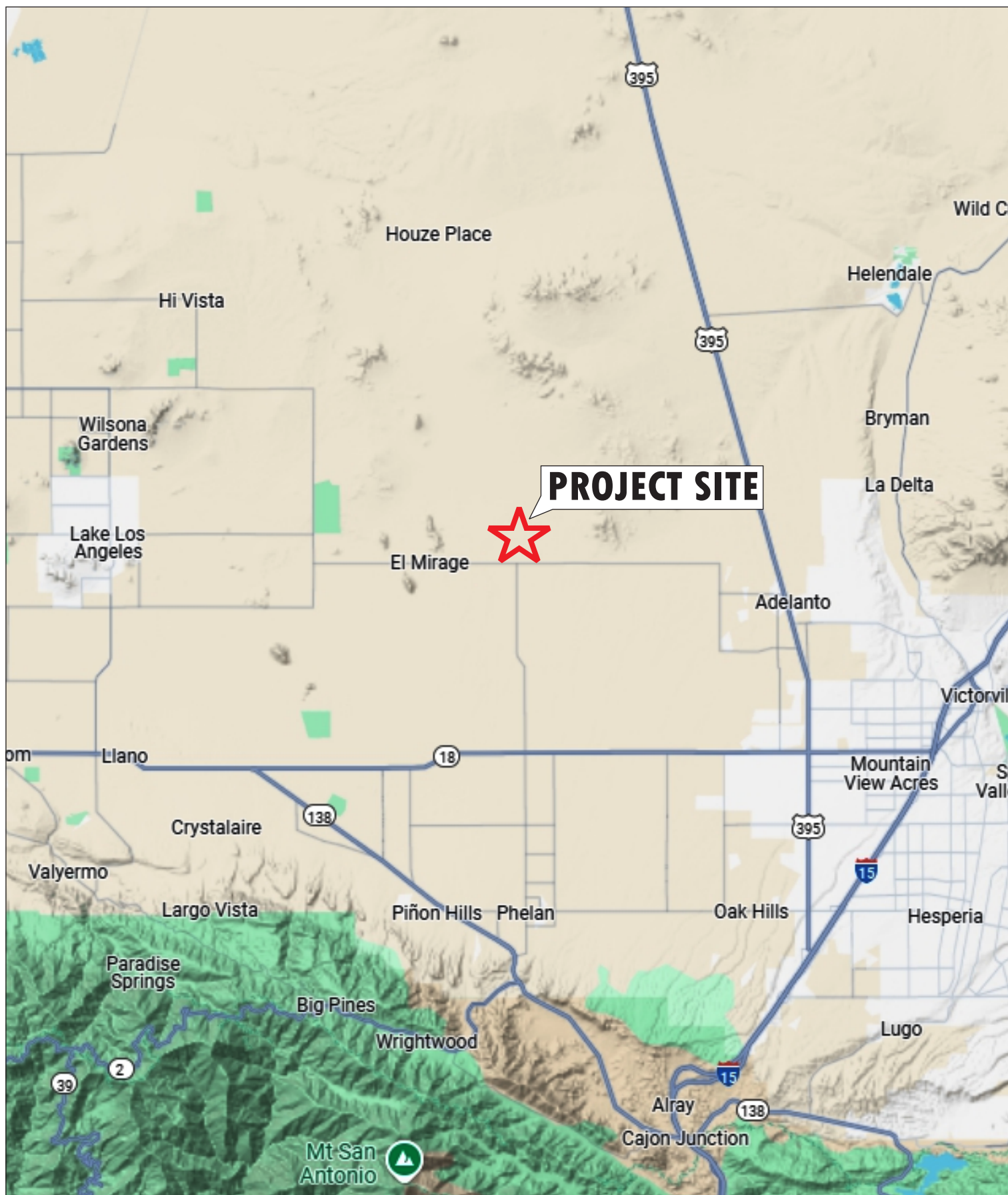
Federal: Federal Aviation Administration

State of California: Lahontan Regional Water Quality Control Board, California Department of Fish & Wildlife, Caltrans Division of Aeronautics.

County of San Bernardino: Land Use Services Department-Building and Safety, Traffic, Land Development Roads/Drainage, Public Health, Environmental Health Services, Public Works, Surveyor, and County Fire.

Regional: Mojave Desert Air Quality Management District (MDAQMD)

Local: None

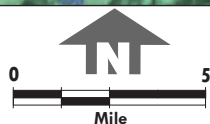


REGIONAL VICINITY

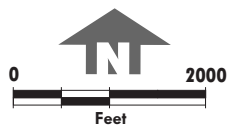
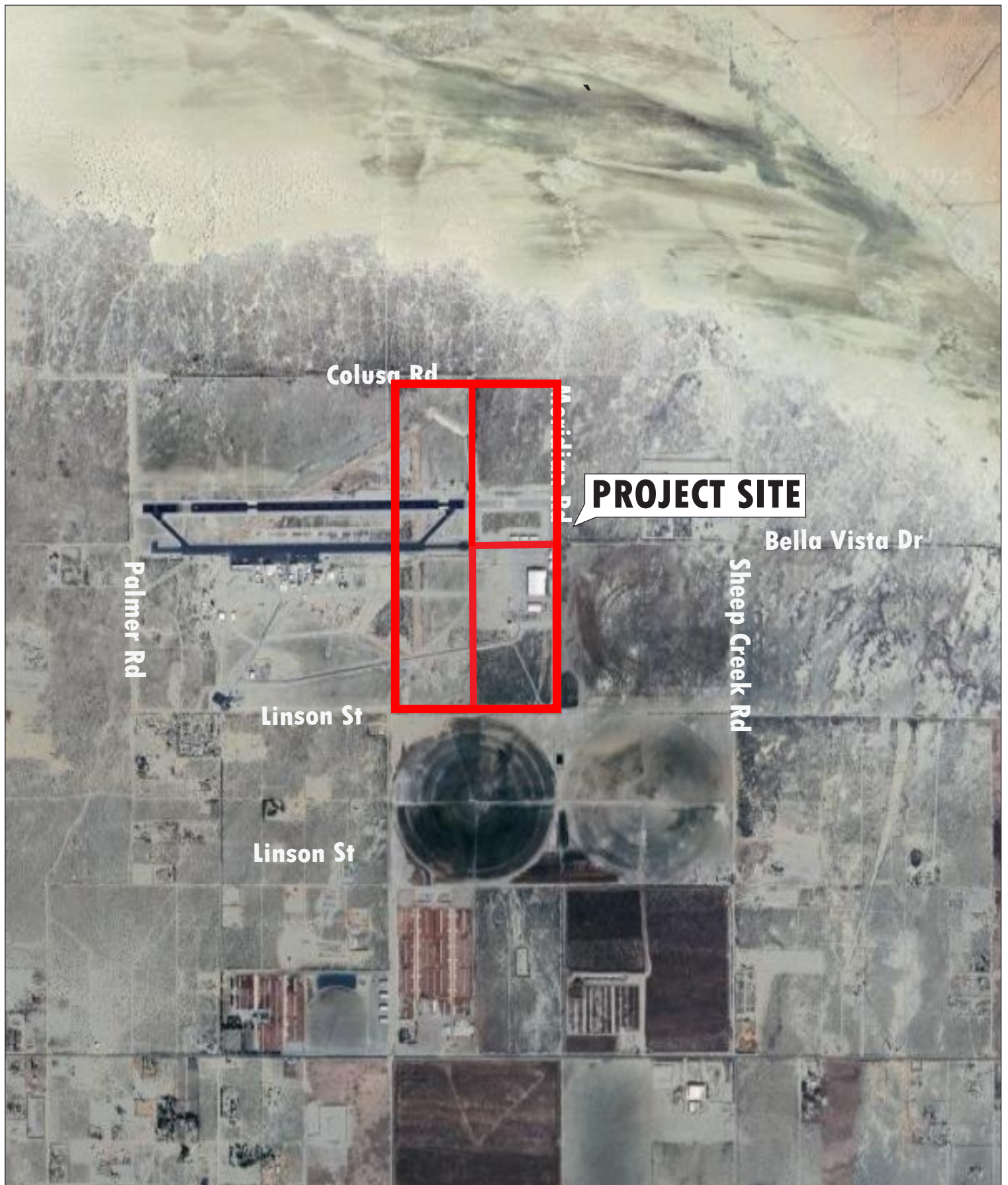
**GENERAL ATOMICS AIRFIELD
DESERT HORIZONS II**

County of San Bernardino, California

FIGURE 1



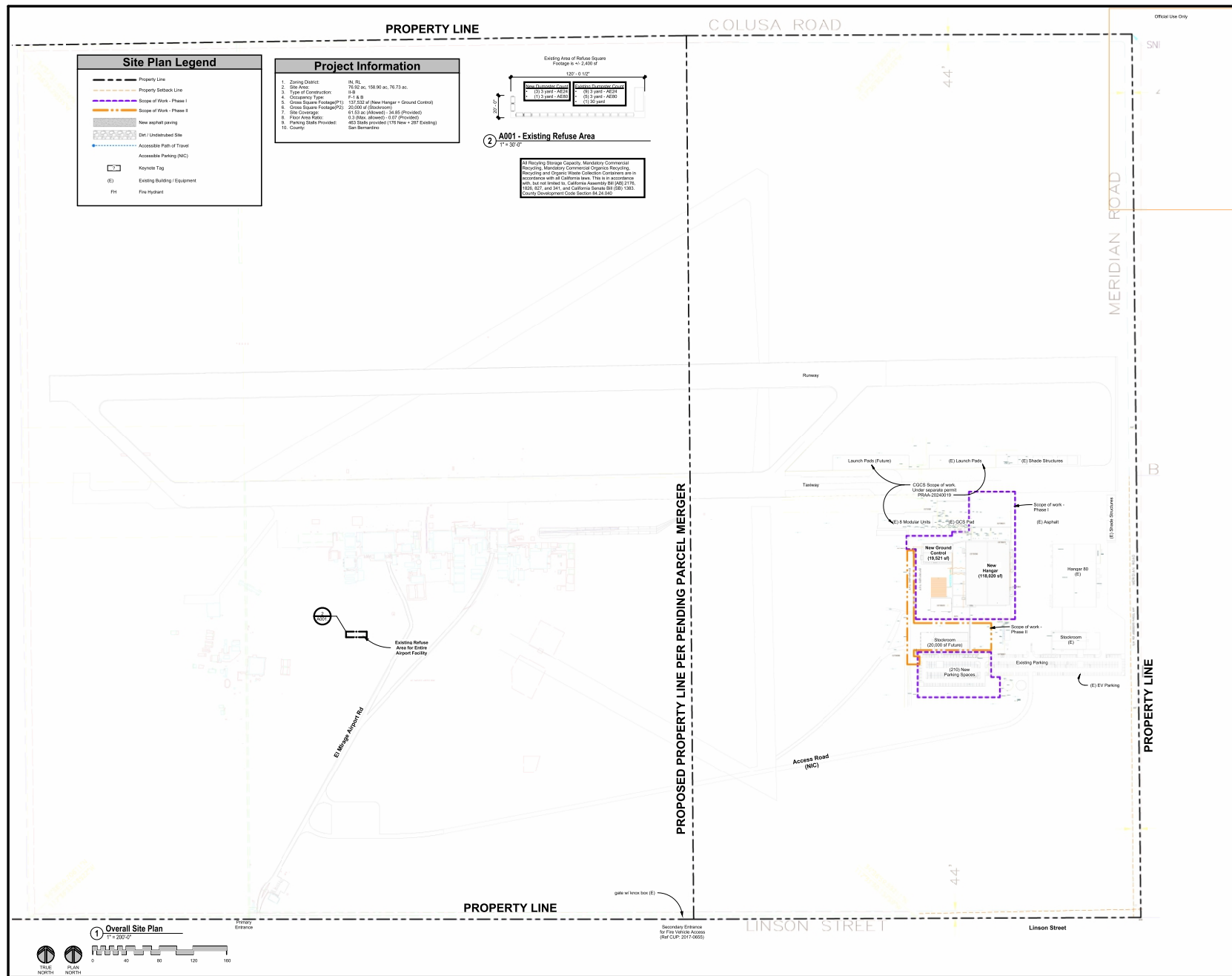
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VICINITY MAP
GENERAL ATOMICS AIRFIELD
DESERT HORIZONS II
County of San Bernardino, California

FIGURE 2



Official Use Only

PARKWAY CONSTRUCTION • ARCHITECTURE

GENERAL ATOMICS

GA - DESERT HORIZONS II CUP

73 El Mirage Airport Road, Adelanto, CA 93201

General Atomics & Affiliates Co.
73 El Mirage Airport Road
Adelanto, CA 93201
Contact: James Rogers
Phone: 805.226.0567

Architect
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Email: info@parkway-caa.com

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Downey Park, AZ 66211
Contact: Scott Jones
Phone: 913.477.4001

Surveyor
Troy & Associates
2 Ventura, Suite 200
Irvine, CA 92618
Contact: Scott Jones
Phone: 949.477.4001

Site Preparation Engineer
Paul Frazier

NOT FOR CONSTRUCTION

NOT FOR REGULATORY APPROVAL, PERMITTING OR CONSTRUCTION
Architect: Matthew Hockeaux

No.	Description	Date
1	Overall Site Plan	2025.07.23
2	Overall Site Plan	2025.07.23
3	Overall Site Plan	2025.07.23
4	Overall Site Plan	2025.07.23
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100	Overall Site Plan	2025.07.23

Overall Site Plan

A001.

CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

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

On May 20, 2025 the County of San Bernardino mailed notification pursuant to AB52 to the following tribes: Colorado River Indian Tribe, Fort Mojave Indian Tribe, Gabrieleno Mission Indians – Kizh Nation, Gabrieleno Tongva San Gabriel Band of Mission Indians, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, Twenty-Nine Palms Band of Mission Indians, Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians). Requests for consultations were due to the County by June 26, 2025. **Table 2** below shows a summary of comments and responses.

Table 2: AB-52 Consultation Summary

Tribe	Comment Letter Sent	Summary of Response	Conclusion
Colorado River Indian Tribe	May 20, 2025	No response received	No response received
Fort Mojave Indian Tribe	May 20, 2025	No response received	No response received
Gabrieleeño Band of Mission Indians – Kizh Nation	May 20, 2025	No response received	No response received
Gabrieleno Tongva San Gabriel Band of Mission Indians	May 20, 2025	No response received	No response received
Morongo Band of Mission Indians	May 20, 2025	Recommended mitigation provided	Mitigation Measures Incorporated
Soboba Band of Luiseño Indians	May 20, 2025	No response received	No response received
Twenty-Nine Palms Band of Mission Indians	May 20, 2025	No mitigations provided but tribe wishes to be on circulation list for draft IS/MND	No mitigations provided but tribe wishes to be on circulation list for draft IS/MND
Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians)	May 20, 2025	Recommended mitigation provided	Mitigation Measures Incorporated

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

EVALUATION FORMAT

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

No Impact: No impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact: No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact with Mitigation Incorporated: Possible significant adverse impacts have been identified or anticipated, and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized in the required Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact requiring mitigation to be reduced to a level that is less than significant as indicated in the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agricultural / Forest Resources	<input type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology / Soils	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards / Hazardous Materials
<input type="checkbox"/> Hydrology / Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities / Service Systems	<input type="checkbox"/> Wildfire	<input type="checkbox"/> Mandatory Findings of Significance

LEAD AGENCY DETERMINATION

On the basis of this initial evaluation, the following finding is made:

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

Signature: (Planner)

Date

Signature: (Supervising Planner)

Date

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade an existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(Check ☐ if project is located within a view-shed of any Scenic Route listed in the General Plan):

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; Policy Plan Natural Resources Map, NR-3 Scenic Routes & Highways

Impact Analysis

a) *Have a substantial adverse effect on a scenic vista?*

Less than Significant Impact. The Project Site is located approximately 10 miles west of the City of Adelanto within the community of El Mirage, unincorporated San Bernardino County. The Countywide Plan/Policy Plan (adopted November 27, 2020) typically associates impacts to scenic vistas with the diminishment of the aesthetic value of lands adjacent to scenic highways. The Project as proposed will not impact such designated lands as the Countywide Plan does not identify a scenic vista within the vicinity of the Project Site. Also, the Project is not located within a formally designated state or federal scenic area. There will be no substantial adverse effect on a scenic vista, as there are none identified within the vicinity of the Project Site that would be affected by the Proposed Project. The Project is to construct and operate an additional hangar building as an expansion to an existing well-established airfield and is compatible with the existing development. Therefore, the Proposed Project would not have a substantial adverse effect on a scenic vista. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. The Proposed Project is not located on or within close proximity of a state scenic highway. The Project will not substantially damage scenic resources, such as trees, rock outcroppings, or historic buildings within a state scenic highway. Also, no rock outcroppings or other scenic resources exist onsite. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- c) *Substantially degrade an existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

No Impact. The Proposed Project is located within a rural desert area surrounded by vacant land to the north, east and south, and one single family residence (SFR) approximately 0.25 miles to the west of the western end of the existing runway, and 1.28 miles west of the proposed development area. Given the existence of the operation of El Mirage Airfield since 1985 and the overall combined size of the parcels upon which it is located, it is unlikely that the proposed structure would result in any impact on public view. Therefore, less significant impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The Proposed Project Site will not create a new source of light that would be perceptible to adjacent uses. Existing lighting is associated with operations of the airfield. The Proposed Project would generate additional lighting when compared to the existing vacant use. The lighting would be designed in compliance with the San Bernardino County Development Code 83.07.060. This ordinance minimizes direct glare and prevents excessive lighting, thereby minimizing light trespass and pollution caused by inappropriate or misaligned light fixtures and promotes common courtesy among any future neighbors. The Proposed Project would be designed to adhere to these lighting standards, and demonstration of compliance would be required prior to the issuance of a building permit. Therefore, less significant impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(Check ☐ if project is located in the Important Farmlands Overlay):

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; Policy Plan Natural Resources Element, Map *NR-5 Agricultural Resources*; California Department of Conservation, California Important Farmland Finder

Impact Analysis

- a) *Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. The California Department of Conservation does not designate the Project Site as Prime, Unique, or Grazing farmland, or considered Farmland of Statewide or Local Importance, according to the Farmland Mapping and Monitoring Program.¹ The Project Site is not designated as agricultural, according to the Policy Plan. The Proposed Project would not convert Prime or Unique Farmland, or Farmland of Statewide or Local Importance. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- b) *Conflict with existing zoning for agricultural use or a Williamson Act contract?*

No Impact. According to Policy Plan map NR-5 *Agricultural Resources*, the Project Site is not identified as a part of a Williamson Contract.² The Project Site is not designated as agricultural, according to the Policy Plan. The Proposed Project would not result in conflicts with existing zoning for agriculture use, or a Williamson Contract. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

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

No Impact. The Project Site consists of an operational airfield and vacant desert land which has never been designated as forest land or timberland. Development of the Proposed Project would not result in rezoning of forest land as no forest land occurs within or surrounding the Project Site. The project would also not conflict with existing zoning for, or cause rezoning of timberland, or 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)). Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- d) *Result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The Project Site is a fully operational airfield on approximately 800 acres in the high desert of San Bernardino County California. The Project Site and surrounding vicinity consists of vegetation that belongs to the Joshua Tree Woodland Plant Community, featuring creosote bushes (*Larrea tridentata*), brittlebrush (*Encelia farinosa*), and other small grasses and shrubs as well as its namesake Joshua trees (*Yucca brevifolia*). There is no forest land on the Project Site or in the vicinity. Implementation of the Proposed Project would not result in loss of forest land or conversion of forest land to non-forest use. No impacts are identified or are anticipated, and no mitigation measures are required.

¹ <https://maps.conservation.ca.gov/dlrp/ciff/> accessed March 10, 2025.

² [NR-5 Agricultural Resources](#) accessed March 10, 2025

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

No Impact. The Proposed Project will not involve other changes in the existing environment, which due to their location or nature, could result in the conversion of farmland to a non-agricultural use, because the site is currently not used for agricultural purposes. No adverse impacts are identified or are anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(Discuss conformity with the South Coast Air Quality Management Plan, if applicable):

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; Mojave Desert Air Quality Management Plan (MDAQMD); *CalEEMod 2022*, July 8, 2025, Lilburn Corporation; (Appendix A); *Transportation Generation Analysis*, July 8, 2025, Ganddini Group (Appendix H-1)

Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The Project Site is in San Bernardino County within the Mojave Desert Air Basin (MDAB). The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains throughout the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in southern California by differential heating are channeled through the MDAB. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet), whose passes form the main channels for these air masses. The MDAB is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 feet). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley).

The U.S. Environmental Protection Agency (USEPA), under the federal Clean Air Act (CAA), establishes maximum ambient concentrations for seven criteria air pollutants (CAPs). These maximum concentrations are known as the National Ambient Air Quality Standards (NAAQSs). The seven CAPs are ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead (Pb).

For areas within the State that have not attained air quality standards, the California Air Resources Board (CARB) works with local air districts to develop and implement attainment plans to obtain compliance with both federal and State air quality standards. The local air district with jurisdiction over the Project Site is the Mojave Desert Air Quality Management District (MDAQMD).

The MDAQMD and the Southern California Association of Governments (SCAG) are responsible for formulating and implementing the air quality attainment plan (AQAP) for the MDAB. Regional AQAPs were adopted in 1991, 1994, and 1997. The following the State Implementation Plan (SIP) and AQAP are the currently approved plans for the Basin region:

- 1997 SIP for O₃, PM₁₀, and NO₂
- 1995 Mojave Desert Planning Area Federal PM₁₀ Attainment Plan; no formal action by the USEPA.

The MDAQMD completed the 2004 Ozone Attainment Plan (State and federal) in April 2004, which was approved by the USEPA. The most recent update to the Federal Ozone Plan took place in January 2023. On January 23, 2023, the 70-ppb federal 8-hour ozone standard was adopted. According to the MDAQMD, a project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable MDAQMD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and it is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

The federal Clean Air Act and California Clean Air Act were established in an effort to assure that acceptable levels of air quality are maintained. These levels are based upon health-related exposure limits and are referred to as National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The ambient air quality standards establish maximum allowable concentrations of specific pollutants in the atmosphere and characterize the amount of exposure deemed safe for the public. Areas that meet the standards are designated attainment and if found to be in violation of primary standards are designated as nonattainment areas.

The EPA and the CARB have designated portions of the MDAQMD as nonattainment for a variety of pollutants, and some of those designations have an associated classification. **Table 3** lists these designations and classifications. The MDAQMD has adopted attainment plans for a variety of nonattainment pollutants.

**Table 3:
State and Federal Air Quality
Designations and Classifications**

Ambient Air Quality Standard	Status
Eight-hour Ozone (Federal 70 ppb (2015))	Expected Non-attainment; to be determined.
Ozone (State)	Non-attainment; classified Moderate
PM ₁₀ (24-hour Federal)	Non-attainment; classified Moderate (portion of MDAQMD in Riverside County is unclassifiable/attainment)
PM _{2.5} (Annual Federal)	Unclassified/attainment
PM _{2.5} (24-hour Federal)	Unclassified/attainment
PM _{2.5} (State)	Non-attainment (portion of MDAQMD outside of Western Mojave Desert Ozone Non-Attainment Area is unclassified/attainment)
PM ₁₀ (State)	Non-attainment
Carbon Monoxide (State and Federal)	Unclassifiable/Attainment
Nitrogen Dioxide (State and Federal)	Unclassifiable/Attainment
Sulfur Dioxide (State and Federal)	Attainment/unclassified
Lead (State and Federal)	Unclassifiable/Attainment
Particulate Sulfate (State)	Attainment
Hydrogen Sulfide (State)	Unclassified (Searles Valley Planning Area is non-attainment)
Visibility Reducing Particles (State)	Unclassified

The MDAQMD acknowledges that strict consistency with all aspects of the Attainment Plan is not required in order to make a finding of no conflict. Rather, a project is considered to be consistent with the Attainment Plan if it furthers one or more policies and does not obstruct other policies.

Generally, compliance with MDAQMD emissions reductions and control requirements also act to reduce project air pollutant emissions. In combination, project emissions-reducing design features and regulatory/operational programs are consistent with and support overarching Attainment Plan air pollution reduction strategies. Project support of these strategies promotes timely attainment of Attainment Plan air quality standards and would bring the project into conformance with the Attainment Plan. As shown below, the Proposed Project's emissions do not exceed any MDAQMD thresholds during either short-term construction or long-term operations. Therefore, the Proposed Project is not anticipated to exceed the Attainment Plan assumptions for the Project Site and is found to be consistent with the Attainment Plan for the second criterion. Based on the above, the Proposed Project would not conflict with implementation of the MDAQMD Attainment Plans, impacts are considered to be less than significant. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

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. The Proposed Project's construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2022 (see

Appendix A). CalEEMod was used to estimate the on-site and off-site construction emissions. The emissions incorporate Rule 402 and 403 by default as required for dust control and nuisance during construction.

Construction Emissions

Construction activities associated with the Proposed Project would have the potential to generate air emissions and toxic air contaminant emissions. The Proposed Project has been anticipated in the modeling to start construction no sooner than January 2026 and be operational in 2027. Demolition activities associated with existing improvements on-site were included in the modeling. The resulting maximum emissions generated by construction of the Proposed Project are shown in **Table 4**, below.

Table 4:
Construction Emissions Summary
(Pounds per Day)

Equipment	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
<i>Summer-Daily Max</i>						
2026	1.42	10.9	18.4	0.03	1.48	0.62
<i>Winter-Daily Max</i>						
2026	3.22	29.2	29.7	0.05	9.14	5.14
2027	4.2	10.5	16.4	0.03	1.43	0.58
MDAQMD Threshold (lbs/day) ³	137	137	548	137	82	65
Significant	No	No	No	No	No	No

Source: CalEEMod 2022.

As shown in **Table 4**, the anticipated construction emissions are less than the MDAQMD thresholds and would be considered less than significant. The Proposed Project shall comply with MDAQMD Rules 402 and 403, as listed below.

Compliance with MDAQMD Rules 402 and 403

Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5}).

The Project Proponent would be required to comply with Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the AQMP, which identifies Best Available Control Technologies (BACTs) for area sources and point sources. Although the Proposed Project does not exceed MDAQMD thresholds, the Applicant is required to comply with applicable MDAQMD Rules 402 for nuisance and 403 for fugitive dust control. This would include, but not be limited to the following BACMs and BACTs:

1. The Project Proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.

³ MDAQMD CEQA Guidelines. [Rules & Regulations | Mojave Desert Air Quality Management District \(ca.gov\)](#). Accessed on July 22, 2024

- a) The Project Proponent shall ensure that watering of the site or other soil stabilization methods shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (2x daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.
- b) The Project Proponent shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.
- c) The Project Proponent shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.
- d) The Project Proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

Although the Proposed Project would not exceed MDAQMD thresholds for exhaust emissions during operations, the Applicant would be required to implement the following conditions as required by MDAQMD:

- a) All equipment must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel. The Project Proponent shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.
- b) The operator shall comply with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

The operational mobile source emissions were calculated using the Transportation Generation Analysis (Appendix H-1). The study shows the existing facility-generated AM and PM peak hour classification counts for the typical weekday trip generation rates based on the square footage of the existing General Atomics facility (see **Table 5**).

The Proposed Project trip generation forecast based on average rates for the general aviation expansion determined from the counts at the existing facility at the site are shown in **Table 6**. Accordingly, the Proposed Project is forecast to generate approximately 542 daily trips, including 30 trips during the AM peak hour and 63 trips during the PM peak hour.

**Table 5:
Existing Facility Trip Generation**

Land Use	AM Peak Hour			PM Peak Hour			Daily Volume
	In	Out	Total	In	Out	Total	
Passenger Car	14	1	18	3	16	46	332
Light Truck – 2 axle	4	3	8	0	3	12	164
Medium Truck – 3 axle	0	0	0	0	0	0	0
Heavy Truck (4+ axle)	1	1	2	0	0	0	2
Subtotal Trucks	5	4	10	0	3	12	166
Total Trips	19	5	28	3	19	58	498

Table 6:
Proposed Project Trip Generation Forecast

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	Volume
Passenger Car	16	3	19	3	47	50	362
Light Truck – 2 axle	5	4	9	0	13	13	178
Medium Truck – 3 axle	0	0	0	0	0	0	0
Heavy Truck (4+ axle)	2	0	2	0	0	0	2
Subtotal Trucks	7	4	11	0	13	13	180
Total Trips	23	7	30	3	60	63	542

Emissions associated with the Proposed Project's estimated total daily trips were modeled to represent summer and winter operational emissions, respectively. The model results are shown in Tables 7 and 8.

Table 7:
Summer Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	1.29	5.54	17.5	0.06	6.08	1.63
Area	4.73	0.06	6.85	<0.005	0.01	0.01
Energy	0.10	1.81	1.52	0.01	0.14	0.14
Totals (lbs./day)	6.13	7.41	25.8	0.08	6.23	1.78
MDAQMD Threshold	137	137	548	137	82	65
Significance	No	No	No	No	No	No

Source: CalEEMod.2022.1.1.29 Summer Emissions.

Table 8:
Winter Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	1.18	5.86	13.7	0.06	6.08	1.63
Area	3.61	-	-	-	-	-
Energy	0.10	1.81	1.52	0.01	0.14	0.14
Totals (lbs./day)	4.89	7.67	15.2	0.07	6.22	1.77
MDAQMD Threshold	137	137	548	137	82	65
Significance	No	No	No	No	No	No

Source: CalEEMod.2022.1.1.29 Winter Emissions.

As shown in **Table 7** and **Table 8**, the Proposed Project summer and winter operational emissions do not exceed MDAQMD thresholds. Overall, the Proposed Project does not exceed applicable MDAQMD regional thresholds either during construction or operational activities. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

Less than Significant Impact. The Proposed Project operational-sourced emissions would not exceed applicable regional thresholds of significance established by the MDAQMD.

Additionally, Project-related trips will not cause or result in CO concentrations exceeding applicable state and/or federal standards (CO “hotspots”). The nearest sensitive receptor to the area of Project disturbance is approximately 1.2 miles to the southwest. Project operational-source emissions would therefore not adversely affect sensitive receptors within the vicinity of the project. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The Project consists of constructing a new 118,020 square foot hangar building for assembly and housing of unmanned aircraft, a 19,512 square foot Ground Control building for training and testing systems, and a 20,000 square foot Stockroom building on approximately 20-acres of the 77-acre parcel, alongside an existing 140,000 square foot hangar building (including accessory structures). The Project operations are not associated with the emission of objectionable odors. Potential odor sources associated with the Proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. Standard construction requirements including compliance with MDAQMD Rules 402 and 403 would minimize odor impacts resulting from construction activity. Any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with San Bernardino County Development Code Division 3 Development Standards and solid waste regulations to prevent occurrences of public nuisances. There would be no residential uses or other sensitive receptors that could be adversely affected by operational odors in the vicinity of the Project Site. Therefore, odors associated with the Proposed Project would be less than significant. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

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

☐ Check if project is located in the Biological Resources Overlay or Contains habitat for any species listed in the California Natural Diversity Database

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *Biological Resources Assessment, Jurisdictional Delineation, and Native Plant Protection Plan*, April 2025, Jennings Environmental, Inc. (Appendix B)

Regulatory Framework

Federal Endangered Species Act

Administered by the United States Fish and Wildlife Service (USFWS), the federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their

habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a 'take' under the ESA. Section 9(a) of the ESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." 'Harm' and 'harass' are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The USFWS identifies critical habitat for endangered and threatened species. Critical habitat is defined as areas of land that are considered necessary for endangered or threatened species to recover. The goal is to restore healthy populations of listed species within their native habitat so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the federal ESA, all federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in destruction or adverse modification of the critical habitat. There is no critical habitat designated in the study area.⁴

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S. Code Sections 703-711) includes provisions for protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others (including those that are not sensitive). Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country and is enforced in the United States by the USFWS. In 1962 it was updated to address how Native American tribes can collect feathers from protected birds for religious ceremonies (a practice otherwise banned by the MBTA). As a general/standard condition, the project must comply with the MBTA.

California Endangered Species Act

The California ESA is like the federal ESA in that it contains a process for listing of species and regulating potential impacts to listed species. California ESA Section 2081 authorizes the CDFW to require an Incidental Take Permit (ITP) for the take of listed species for scientific, educational, or management purposes.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) enacted a process by which native plants are listed as rare or endangered. The NPPA regulates the collection, transport, and commerce of listed plants. Plants listed as rare under NPPA were also designated rare under the California ESA.

California Fish and Wildlife Code 1600-1616

California Fish and Game Code Sections 1600 through 1616 require a CDFW agreement for projects affecting riparian and wetland habitats through issuance of a Streambed Alteration Agreement (SAA).

⁴ Study area includes the Project disturbance area with an additional 50 foot buffer zone.

California Fish and Wildlife Code 3503

Pursuant to California Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA.

California Natural Communities Conservation Planning Act

CDFW's Natural Community Conservation Planning (NCCP) program is an unprecedented effort by the State of California, and numerous private and public partners, that takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species.

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the U.S. Fish and Wildlife Service provide the necessary support, direction, and guidance to NCCP participants.

There are currently 17 approved NCCPs (including 6 subarea plans) and more than six NCCPs in various stages of planning (includes one subarea plan), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. The Project Site does not currently fall under a NCCP program.

California Native Plant Act

The California Native Plant Act was passed in 1981 to protect non-listed California desert native plants from unlawful harvesting on both public and privately owned lands. Harvest, transport, sale, or possession of specific native desert plants is prohibited unless a person has a valid permit. The following plants are under the protection of the California Desert Native Plants Act:

- Dalea spinosa (smoketree)
- All species of the genus Prosopis (mesquites)
- All species of the family Agavaceae (century plants, nolinias, yuccas)
- Creosote Rings, ten feet in diameter or greater
- All Joshua Trees

The Project would be required to comply with the San Bernardino County Desert Native Plant Protection Ordinance. The removal of any trees listed under Section 88.01.060 would be required to comply with Section 88.01.050, which requires the Project applicant to apply for a tree or Plant Removal Permit prior to removal from the Project Site.

The Proposed Project Site does not contain any other species (other than western Joshua tree) that are protected species under San Bernardino County Development Code § 88.01.060 and the California Desert Native Plant Act. Because protections for the western Joshua tree are covered

under the western Joshua tree act, the Project is considered in compliance with the San Bernardino County Development Code and the Desert Native Plant Act.

Impact Analysis

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

Less than Significant Impact with Mitigation Incorporated. A Biological Resources Assessment, Jurisdictional Delineation, and Native Plant Protection Plan (BRA) was prepared for the Proposed Project by Jennings Environmental, Inc. April 2025 (see Appendix B). Jennings Environmental, Inc. (Jennings) conducted a background data search for information on plant and wildlife species known occurrences within the vicinity of the Project Site. The BRA addresses the potential effects of the Proposed Project on designated critical habitats and/or any species currently listed or candidate for listing as endangered or threatened under the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA), as well as species designated as sensitive by the California Department of Fish and Wildlife (CDFW) or the California Native Plant Society (CNPS).

Following the data review, surveys were performed on March 18, 2025, during which the biological resources on the Project Site and in the surrounding areas were documented. As part of 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.

Special Status Species:

No State and/or federally listed threatened or endangered species or other sensitive species were observed on-site during surveys.

Joshua Trees: All Joshua trees (eastern and western) are protected under the San Bernardino County Desert Native Plant Protection Ordinance. According to the San Bernardino Development Code *Section 88.01.060 Desert Native Plant Protection* the removal of any Eastern Joshua trees would be required to comply with *Section 88.01.050 Native Tree or Plant Removal Permits*, which requires the applicant to obtain a Tree or Plant Removal Permit prior to the removal of any Eastern Joshua trees from the Project Site.

The Joshua trees on the Project Site are western Joshua trees (*Yucca brevifolia*). According to the western Joshua tree census taken by Jennings, there are 19 western Joshua trees present onsite, with 15 dead trees and 4 living trees. Therefore, the Proposed Project would result in impacts to western Joshua trees within the Project boundary which will require a Western Joshua Tree Conservation Act Incidental Take Permit (ITP) from CDFW. The ITP will need to detail all impacts on the species and what alternative relocation plans are proposed. Additionally, the ITP will require mitigation for the loss of individual trees. With implementation of recommended mitigation in compliance with the Western Joshua Tree Conservation Act ITP from CDFW, there would be a less than significant impact.

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

No Impact. The Project area was also surveyed with 100 percent visual coverage and no definable bed or bank features exist on the Project Site. As such, the subject parcel does not contain any riparian areas under CDFW or Army Corps jurisdiction. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

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

No Impact. Jurisdictional Features: The following sources were reviewed to determine the potential presence of jurisdictional streams/drainages, wetlands, and their location within the watersheds associated with the Project Site, and other features that might contribute to federal or state jurisdictional authority located within watersheds associated with the Project Site:

- National Wetlands Inventory (NWI) maps.⁵ The NWI database indicates potential wetland areas based on changes in vegetation patterns as observed from satellite imagery. This database is used as a preliminary indicator of wetland habitats because the satellite data are not precise.;
- USGS National Hydrography Dataset (NHD) provides the locations of blue-line streams as mapped on 7.5-Minute Topographic Map coverage.
- Aerial Imagery (Google Earth);
- USGS 7.5-Minute Topographic Maps; and
- Natural Resources conservation Service (NRCS) Soil Survey.

The USACE has the authority to permit the discharge of dredged or fill material in Waters of the U.S. (WOUS) under Section 404 of the Clean Water Act (CWA). While the Regional Water Quality Board has authority over the discharge of dredged or fill material in Waters of the State under Section 401 CWA as well as the Porter-Cologne Water Quality Control Act.

The Proposed Project would have no impact on federally protected wetlands as defined by Section 404 of the CWA. The Project Site was surveyed with 100 percent visual coverage and no drainage features were present that met the definition for WOUS. As such, the subject parcel does not contain any wetlands, WOUS., or Waters of the State.

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

Less than Significant Impact. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors provide opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat areas. Adequate cover is essential for a corridor to function as a wildlife movement area. Wildlife corridors allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

⁵ USFWS 2018b

According to the California Essential Habitat Connectivity Project, the Project Site is not mapped within an area for wildlife movement. Additionally, the site is not within a wildlife linkage as mapped by Mojave Desert Land Trust. Therefore, the Proposed Project will have a less than significant impact on any current wildlife corridors or habitat conservation plans.

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less than Significant Impact with Mitigation Incorporated. As stated above, all Joshua trees are also protected under the San Bernardino County Desert Native Plant Protection Ordinance. According to the San Bernardino Development Code *Section 88.01.060 Desert Native Plant Protection* the removal of any Western Joshua trees would be required to comply with *Section 88.01.050 Native Tree or Plant Removal Permits*, which requires the applicant to obtain a Tree or Plant Removal Permit prior to the removal of any Joshua trees from the Project Site. With implementation of recommended mitigation, the Project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- f) *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. According to the BRA, the Project Site is not located within the planning area of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or state habitat conservation plan as identified in the California Department of Fish and Wildlife's California Natural Community Conservation Plans Map (August 2023).⁶ No impacts are identified or are anticipated, and no mitigation measures are required.

Mitigation Measures:

BIO-1: A Western Joshua Tree Conservation Act Incidental Take Permit Western Joshua Tree Conservation Act Incidental Take Permit (ITP) will be required from the CDFW for the removal of western Joshua trees. The ITP will need to detail all impacts on the species and what alternative relocation plans are proposed. Additionally, the ITP will require mitigation for the loss of individual trees.

BIO-2: Per the San Bernardino County Development Code *Section 88.01.060 Desert Native Plant Protection* the removal of any Joshua trees (eastern and western) would be required to comply with *Section 88.01.050 Native Tree or Plant Removal Permits*. Applicant shall obtain a Tree or Plant Removal Permit prior to the removal of any Joshua trees from the Project Site.

BIO-3: Nesting Birds: Since there is some habitat within the Project site and adjacent area that is suitable for nesting birds in general, the following mitigation measure should be implemented. Nesting bird nesting season generally extends from February 1 through September 15 in southern California and specifically, March 15 through August 31 for migratory passerine birds. To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist will conduct pre-construction Nesting Bird Surveys (NBS) prior to Project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action will be required. If an active nest is found, the biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage, and

⁶ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>. Accessed April 4, 2025.

expected types, intensity, and duration of the disturbance. The nests and buffer zones shall be field-checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Possible significant adverse impacts have been identified and may occur therefore compliance with Mitigation Measures BIO-1, BIO-2 and BIO-3, would reduce possible impacts to a less than significant level.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(Check if project is located in the Cultural ☐ overlays or cite results of cultural resource review)

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *Cultural Resources Study for the General Atomics Aeronautical Systems Project*, June 27, 2025, BFS A Environmental Services, a Perennial Company. (Appendix C)

Impact Analysis

BFS A Environmental prepared the *Cultural Resources Study for the General Atomics Aeronautical Systems Project*. The purpose of this investigation was to locate and record any cultural resources within the project and subsequently evaluate any resources as part of the County of San Bernardino environmental review process, conducted in compliance with the California Environmental Quality Act (CEQA). The archaeological investigation of the project includes an archaeological records search conducted at the South-Central Coastal Information Center (SCCIC) at California State University, Fullerton (CSU Fullerton) in order to assess previous archaeological studies and identify any previously recorded archaeological sites within the project or in the immediate vicinity.

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Bernardino County in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, the criteria outlined in CEQA provide the guidance for making such a determination.

- a) *Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Less than Significant Impact. Historic land use data was compiled by BFS A through institutional records search, archival research, an intensive cultural resource survey of the approximately 20-acre disturbance area of the 77-acre parcel, and the preparation of a technical report.

According to CEQA (§ 15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

1. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
2. The significance of an historical resource is materially impaired when a project:
 - a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the CRHR; or
 - b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or,
 - c) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources (CRHR) as determined by a lead agency for purposes of CEQA.

While the existing airfield facility has been in operation since the 1940s, the Project site located in the northeastern portion of the airfield contains several buildings and ancillary structures constructed between 2018 and 2020 as part of the facility expansion. The structures on the Project site are less than 50 years old and therefore are not considered a historical resource under CEQA Guideline §15064.5.

A cultural resources survey and records search confirmed no built historic resources are present within the Project site. The records search identified three prehistoric isolates (P-36-031712, P-36-031713, and P-36-032708), which have been reburied in the southeast corner of the Project site. However, these resources will not be impacted by the proposed development, which is concentrated within the northwest portion of the project. Therefore, the Project would not result in a substantial adverse change in the significance of a historical resource, and impacts would be less than significant.

- b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less than Significant Impact with Mitigation Incorporated. The cultural resources assessment for the General Atomic Aeronautical Systems Project has determined that no significant cultural resources are present on the property. Previous cultural studies indicate that the northern half of the subject property and portions of the southern half have been previously monitored and tested for subsurface archaeological deposits by CRM TECH. During monitoring and a supplementary survey, four cultural resources (SBR-31,711H, P-36-031712, P-36-031713, and P-36-032708) were recovered from the ground surface and recorded within the subject property. However, all four resources were evaluated as not significant or California Register of Historic Resources (CRHR)-eligible. Further, Site SBR-31,711H is recorded as a historic trash scatter and appears to have been removed during the grading of the property between 2017 and 2020. P-36-031712, P-36-031713, and P-36-032708 are all prehistoric isolates that were buried approximately 10 feet below the ground surface in the southeast corner of the property and will not be impacted by the proposed development. As such, the Proposed Project will not adversely

impact any known cultural resources. However, the Proposed Project has the potential to adversely impact unknown cultural resources.

Mitigation Measures:

CUL-1: If cultural/historical/archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall cease and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983) shall be contacted immediately to evaluate the find(s). If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted and shall be reported to the County.

Sacred Lands File Search (SLF)

BFSA also requested a SLF search from the NAHC to search for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within the project vicinity. This request is not part of Assembly Bill 52 Native American consultation. The SLF search was returned with negative results.

Based upon the findings of the cultural resources assessment, there is little to no potential to encounter any significant cultural resources during the development of this property; therefore, mitigation monitoring is not recommended. However, if any cultural resources are inadvertently discovered, all construction work in the immediate vicinity of the discovery should cease, and a qualified archaeologist should be consulted to determine if further mitigation measures are warranted. Mitigation measure **CUL-1** would reduce impacts to a less than significant level.

c) *Disturb any human remains, including those interred outside of formal cemeteries?*

Less than Significant Impact. Land Disturbance and Construction activities could potentially disturb human remains interred outside of a formal cemetery. Thus, the potential exists that human remains may be unearthed during earthmoving activities associated with Project construction. If human remains are discovered during construction activities, the Project proponent would be required to comply with the applicable provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097, et. seq., which requires that if the coroner determines the remains to be of Native American origin, he or she will notify the Native American Heritage Commission, who will then identify the most likely descendants to be consulted regarding treatment and/or reburial of the remains. Mandatory compliance with these provisions of California state law would ensure that impacts to human remains, if unearthed during construction activities, would be appropriately treated. California state law (California Health & Safety Code 7050.5) and federal law and regulations ([Archaeological Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) require a defined protocol if human remains are discovered in the State of California regardless of if the remains are modern or archaeological.

Possible significant adverse impacts have been identified or anticipated and therefore Mitigation Measure CUL-1 is required to reduce impacts resulting from inadvertent discoveries to a less than significant level.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *General Atomics Energy Data*, May 9, 2025, Lilburn Corporation.

Regulatory Framework

Building Energy Conservation Standards

The California Energy Conservation and Development Commission (California Energy Commission) adopted 2022 Title 24, Part 6, of the California Code of Regulations and Energy Conservation Standards for new residential and nonresidential buildings. Buildings whose permit applications are submitted on or after January 1, 2023, must comply with the 2022 Energy Code. Title 24 ensures building designs conserve energy. The requirements allow for opportunities to incorporate updates of new energy efficiency technologies and methods into new developments.⁷

Senate Bill 350

Senate Bill (SB) 350 was signed into law in October 2015. SB 350 establishes new clean energy, clean air and greenhouse gas reduction goals for 2030. SB 350 also establishes tiered increases to the Renewable Portfolio Standard: 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030.⁸

Senate Bill 100

Senate Bill 100 (SB 100) was signed into law in September 2018 and increased the required Renewable Portfolio Standards. SB 100 requires the total kilowatt-hours of energy sold by electricity retailers to their end-use customers must consist of at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.⁹

⁷ California Energy Commission. [2022 Building Energy Efficiency Standards](#) Accessed May 12, 2025.

⁸ [Clean Energy and Pollution Reduction Act - SB 350 \(ca.gov\)](#)

⁹ [SB 100 Joint Agency Report \(ca.gov\)](#)

Impact Analysis

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

Less Than Significant Impact.

Electricity used for the Project during construction and operations would be provided by Southern California Edison, which serves more than 15 million customers. SCE derives electricity from varied energy resources including fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. Natural gas would be provided to the Project by Southern California Gas (SoCalGas). Project-related vehicle trip energy consumption will be predominantly gasoline and diesel fuel. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to Project patrons and employees via commercial outlets.

Construction

There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Project construction is required to comply with applicable California Air Resources Board (CARB) regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additionally, as required by California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints.

Fuel

During the construction of the Proposed Project, transportation energy consumption would be dependent on the type of vehicles used, number of vehicle trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Temporary transportation fuel use such as gasoline and diesel during construction would result from the use of delivery vehicles and trucks, construction equipment, and construction employee vehicles. Additionally, most construction equipment during grading would be powered by gas or diesel. Based on output from CalEEMod 2022 (see Appendix A), **Table 9** and **Table 10** show the modeled fuel consumption for all construction activities as demonstrated in Appendix D. *Note the CalEEMod output is extremely conservative for fuel and water consumption.*

Table 9 shows that all construction equipment for all construction phases would be anticipated to utilize 33,155.52 gallons of fuel.

Table 9
Construction Equipment Fuel Consumption Estimates

Phase	Number of Days	Offroad Equipment Type	Amount	Hours / Day	Horsepower	Load Factor	Total Fuel Consumption (gal diesel fuel) ¹⁰
Site Preparation	10	Rubber Tired Dozer	3	8	367	0.40	1863.77
	10	Tractors/Loaders/Backhoes	4	8	84	0.37	584.80
Grading	20	Graders	1	8	148	0.41	513.60
	20	Excavators	1	8	36	0.38	115.79
	20	Rubber Tired Dozer	1	8	367	0.4	1242.52
	20	Tractors/Loaders/Backhoes	3	8	84	0.37	877.20
Building Construction	230	Cranes	1	7	367	0.29	9064.54
	230	Forklifts	3	8	82	0.2	5323.05
	230	Generator Sets	1	8	14	0.74	1120.87
	230	Tractors/Loaders/Backhoes	3	7	84	0.37	8826.84
	230	Welders	1	8	46	0.45	2239.57
Paving	20	Pavers	1	8	81	0.42	320.06
	20	Paving Equipment	2	8	89	0.36	452.15
	20	Rollers	2	8	36	0.38	193.05
	20	Tractors/Loaders/Backhoes	1	8	84	0.37	292.40
Architectural Coating	20	Air Compressors	1	6	37	125.31	112.78
Total Fuel Used in Gallons							33,155.52

Source: CalEEMod 2022

Based on **Table 10** below, fuel consumption from construction worker trips for all phases of construction would be approximately 11,246.46 gallons and vendor (material delivery) trips is anticipated to be approximately 7,291.62 gallons.

Construction worker, vendor, and hauling truck fuel consumption values are based on CalEEMod's default data for vehicles miles traveled (VMT). Construction would represent a "single event" diesel and gasoline fuel resources. Impacts related to transportation energy use during construction would be temporary and would not require the additional use of energy supplies or the construction of new infrastructure.

¹⁰ United States Environmental Protection Agency. 2018. Exhaust and Crankcase Emission Factors for Nonroad Compression-Ignition Engines in MOVES2014b. July 2018. Available at: <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100UXEN.pdf>

Table 10
Construction Trips Fuel Consumption Estimates

Worker Trips				
Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Fuel Used (gallons)¹
Site Preparation	10	17.5	18.5	138.75
Grading	20	15	18.5	231.25
Building Construction	230	66.1	18.5	10,460.21
Paving	20	15	18.5	231.25
Architectural Coating	20	13.2	18.5	185.00
Total Construction Worker Fuel Consumption				11,246.46
Vendor Trips				
Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Fuel Used (gallons)
Building Construction	230	25.8	10.2	7,291.62
Total Construction Vendor Fuel Consumption				7,291.62

Source: CalEEMod 2022

Operations

Energy consumption in support of or related to Project operations would include transportation energy demands, mainly energy consumed by employee vehicles accessing the Project Site as well as facilities energy demands, including energy consumed by building operations and site maintenance activities.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or “plug-in” energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). The Proposed Project is required to comply with Title 24 standards, which require that new 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 has been designed to comply with the 2022 Building Energy Efficiency Standards. The County of San Bernardino would review and verify that the Proposed Project plans would be in compliance with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would also be required to adhere to CALGreen, which establishes planning and design standards for sustainable developments and energy efficiency.

During the operation of the Proposed Project, fuel consumption would result from employee vehicle trips. Project vehicle miles traveled (VMT) were modeled with an automobile fuel efficiency of 24 miles per gallon and 7 miles per gallon. Due to the unpredictability of automotive fuel efficiencies throughout the operation of the Proposed Project, analyzing vehicles with a fuel efficiency ranging between 24 mpg and 7 mpg evaluates the Proposed Project’s anticipated fuel consumption rates at a worst-case scenario setting. As a result, the Proposed Project would be

anticipated to utilize approximately 239,614 gallons of fuel per year based on the Project's additional employees¹¹ based on 2,597,111 miles driven annually (**see Table 11**).

Trip generation and VMT generated by the Proposed Project were considered less than significant. The Proposed Project does not include uses or operations that would inherently result in excessive or wasteful vehicle trips and VMT or associated wasteful vehicle energy consumption. It is not expected to result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities.

Table 11
Operational Fuel Consumption

Operational Trips			
Use	Annual Miles	MPG	Total Gallons (50%)
Industrial	2,597,111	24	54,106.5
		Total	54,106.5
Use	Annual Miles	MPG	Total Gallons (50%)
Industrial	2,597,111	7	185,507.9
		Total	185,507.9
		Grand Total	239,614.4

Source: Assumptions for the vendor trip length and vehicle miles traveled are consistent with CalEEMod 2022 defaults. United States Department of Transportation, Bureau of Transportation Statistics. 2018. National Transportation Statistics 2018. Available at: <https://www.bts.gov/sites/bts.dot.gov/files/docs/browse-statistical-products-and-data/national-transportation-statistics/223001/ntentire2018q4.pdf>.

In 2022, San Bernardino County consumed approximately 915 million gallons of gasoline and 258 million gallons of diesel.¹² The increase in fuel demand from the Proposed Project would represent a 0.02% of the overall 2022 County fuel consumption.

The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of fuel resources, during project construction or operation.

Electricity

Southern California Edison (SCE) provides electricity to the Project Site. Currently, the Project Site is a fully operational airfield facility. Further development of the facility would cause a permanent increase in demand for electricity when compared to existing conditions. The estimated electricity demand for the Proposed Project was estimated from CalEEMod modeling output to be approximately 1,320,975 kWh per year. Electricity consumption by planning area for

¹¹ *Transportation Screening Assessment (Scope for Traffic Study)*, and *Trip Generation Analysis*, Ganddini Group, Inc. May 2, 2025 (Appendix H and Appendix H-1 respectively)

¹² California Energy Commission. <https://www.energy.ca.gov/media/3874>. Accessed August 7, 2024.

industrial use as determined by SCE was 17,353 million kWH (GWh) in the year 2022.¹³ The increase in electricity demand from the Proposed Project would represent 0.000077 percent of the overall SCE industrial consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

Natural Gas

The estimated natural gas demand for the Proposed Project was estimated from CalEEMod modeling output to be approximately 5,939,727 kBTU per year which is equal to 59,397 therms. Natural Gas consumption for the SoCal Gas planning area was 1,645.9 million therms per year in 2022. That equates to 0.000036 percent of the natural gas consumption by planning area for an industrial use determined by the California Energy Commission for the Southern California Gas Company Planning area. The increase in natural gas demand from the Proposed Project would not significantly impact SoCal Gas's level of service.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The Proposed Project would be designed to comply with the County of San Bernardino Greenhouse Gas Emissions Reduction Plan, and the State Building Energy Efficiency Standards (Title 24). The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are recommended.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

¹³ California Energy Commission. 2022 Electricity Consumption by Planning Area. Accessed May 12, 2025.

VII. GEOLOGY AND SOILS

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

(Check if project is located in the Geologic Hazards ☐ or Paleontological Resources Overlay District ☐):

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; San Bernardino Countywide Plan. Hazards Element Map *HZ-1 Earthquake Fault Zones. Revised Geotechnical Report Update*, July 18, 2024, Merrell Johnson Geotechnical, Inc.(Appendix E); *Soil Investigation Report*, April 11, 2025, Merrell Johnson Geotechnical, Inc. (Appendix E-1); *Percolation Test Report*, April 1, 2025, Merrell Johnson Geotechnical, Inc. (Appendix E-2); *Paleontological Assessment for the General*

Atomics Aeronautical Systems Project, June 27, 2025, BFSA Environmental Services, a Perennial Company (Appendix F).

Impact Analysis

- a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- I. *Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
 - II. *Strong seismic ground shaking?*
 - III. *Seismic related ground failure, including liquefaction?*
 - IV. *Landslides?*
- i) **Less than Significant Impact.** The Project Site does not occur within an Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones.¹⁴ According to the San Bernardino County Policy Plan, Hazard Element Map *HZ-1 Earthquake Fault Zone*, the San Andreas Fault is located approximately 20 miles south, and the Helendale Fault is located approximately 25 miles east of the Project Site. Although the potential for rupture on-site cannot be dismissed, it is considered low due to the absence of known faults within the immediate vicinity. Nonetheless, the Proposed Project would be required to comply with the California Building Code requirements and the Uniform Fire Code requirements and all applicable statutes, codes, ordinances, and standards of the San Bernardino County Fire Department. Compliance with these codes and standards would address potential impacts resulting from an earthquake event. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- ii) **Less Than Significant Impact.** No active faults pass through El Mirage.¹⁵ As is the case for most areas of Southern California, ground shaking resulting from earthquakes associated with nearby and more distant faults may occur at the Project Site. It is likely that during life expectancy of the structures built, moderate to severe ground shaking may have potential adverse effects on the Project Site. The design of any structures on-site would incorporate measures to accommodate projected seismic ground shaking in accordance with the California Building Code (CBC) and local building regulations. The CBC is designed to preclude significant adverse effects associated with strong seismic ground shaking. Compliance can ensure that the Proposed Project would not expose people or structures to substantial adverse effects, including loss, injury, or death, involving seismic ground shaking. Impacts due to seismic activity would be less than significant.
- iii) **Less than Significant Impact.** Liquefaction is a process in which cohesion-less, saturated, fine-grained sand and silt soil loses shear strength due to ground shaking and behave as fluid. Based on the Standard Penetration Tests performed in the borings and considering a groundwater level at a depth of 21 feet, the data indicate that there could be a potential for liquefaction in the some of the unconsolidated alluvial deposits below a depth of about 24 feet. In addition, the fines content (percentage of particles smaller than the No. 200 sieve size) in some soil layers is below the limit generally considered to be resistant to liquefaction and the Liquid Limit and Plasticity Index are low. Consequently, there is a potential for liquefaction in some of the deeper layers of saturated sands in the event of a major earthquake. However, liquefaction of the layers of finer-grained soils

¹⁴ San Bernardino Countywide Plan. HZ-1 Earthquake Fault Zones.

¹⁵ San Bernardino Countywide Plan Draft EIR. Geology and Soils. Figure 5.6-1 "Alquist-Priolo Fault Zones and County Fault Hazard Zones.

is not anticipated, and widespread surface settlement over a large area due to liquefaction is not likely. The report concluded that the Project Site is considered non-susceptible to seismically induced soils liquefaction. Therefore, less than significant impacts are identified or are anticipated, and no mitigation measures are required.

- iv) **No Impact.** Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes. The Project Site is not located within an area susceptible to landslides. Furthermore, the Project Site is in an area of relatively flat topography. The potential for seismically induced landslides to occur is considered low as there are no nearby hills or other features that would be susceptible to landslides. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

- b) *Result in substantial soil erosion or the loss of topsoil?*

Less than Significant Impact. Implementation of the Proposed Project would disturb more than one acre of soil. Therefore, the Proposed Project is subject to requirements of the State Water Resources Control Boards General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs would ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. Therefore, less significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less than Significant Impact. The Project Site is relatively flat with no prominent geological features occurring on or within the vicinity of the Project Site. Seismically induced lateral spreading involves lateral movement of soils due to ground shaking. Resistance to lateral loads will be provided by passive earth pressure against the faces of footings and other structural elements below grade, and by friction along the bases of footings and slabs. Passive earth pressure can be taken as 350 pounds per square foot (psf) per foot of depth. Base friction can be taken as 0.35 times the actual dead load. Base friction and passive earth pressure can be combined without reduction. Due to the Project Site being relatively level, the potential for seismically induced lateral ground spreading should be considered low. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. Expansive soils are composed of fine-grained silts and clays which are subject to swelling and contracting. The amount of swelling and contracting is subject to the amount of fine-grained clay materials present in the soils and the amount of moisture either introduced or extracted from the soils. The potential for dynamically induced settlement of the granular soils is also very low. In addition, the soils have very low potential for expansion due to changes in moisture content. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

- e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

Less than Significant Impact. On February 20, 2025, during the Soils Investigation conducted for this project, a 50-foot-deep exploratory boring was drilled where groundwater was encountered at approximately 43-feet below the existing ground surface. Additionally, the soils between the bottom of the leach lines and groundwater contain more than 15% fines.

The expansion and use of an existing of a septic system is proposed, the Percolation Test Report (Appendix E-2) documented the appropriate percolation test procedure as determined per the Local Agency Management Program (LAMP) and the Percolation Testing and Reporting Standards for Onsite Wastewater Treatment Systems by the San Bernadino County Public Health department.

Based on the site reconnaissance conducted by Merrell Johnosn Geotechnical, subsurface excavations, and review of published geologic maps, the area of the proposed expanded on-site effluent disposal system is favorable. The disposal field will be installed in natural soils consisting of silty sand (SM). This material is considered favorable, as defined in Section 3.1 of the County Standard, Reference B. Impacts are expected to be less than significant, and no mitigation measures are required.

- f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less than Significant Impact. The Paleontological Assessment for the project (Appendix F) included a review of paleontological literature and fossil locality records in the area, a review of the underlying geology, and recommendations to mitigate impacts on potential paleontological resources, if necessary.

Paleontological resources are the remains of prehistoric life that have been preserved in the geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age (Society of Vertebrate Paleontology [SVP] 2010) but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat, for example. Fossils are considered a nonrenewable resource under state and local guidelines.

The degree of paleontological sensitivity of any particular area is based on a number of factors, including the documented presence of fossiliferous resources on a site or in nearby areas, the presence of documented fossils within a particular geologic formation or lithostratigraphic unit, and whether or not the original depositional environment of the sediments is one that might have been conducive to the accumulation of organic remains that may have become fossilized over time. Holocene alluvium is generally considered to be geologically too young to contain significant nonrenewable paleontological resources (i.e., fossils) and is thus typically assigned a low paleontological sensitivity.

BFSA personnel conducted a pedestrian survey of the 20-acre property on March 18, 2025. The field methodology employed included walking evenly spaced survey transects set approximately 20 meters apart while visually inspecting the ground surface. All potentially sensitive areas where paleontological resources might be located were closely inspected. Access was not granted to survey the tarmac, parking lot, or areas where the Airfield facility is actively operating in the

northeast portion of the project. However, the majority of this area was developed between 2018 and 2020 and contains little exposed natural ground.

The geology at the Project Site consists of Holocene-aged, young eolian and alluvial fan deposits mapped at the surface, composed of silty and clayey sand and sandy silts. These deposits have a low paleontological sensitivity. Grading is planned at 36 inches below the bottom of the proposed building foundations, which are slab-on-grade concrete pads. This depth is too shallow to reach any of the underlying alluvial sediments of the Sheep Creek fan or the deeper lacustrine sediments of ancient El Mirage Lake.

Paleontological monitoring is not recommended for the project, based on the summary above. However, if paleontological resources are discovered during excavation activities, a qualified paleontologist should be consulted to determine the significance of the discovery. Impacts are expected to be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *CalEEMod 2022, AQ/GHG Detailed Report*, Lilburn Corporation, July 8, 2025 (Appendix A).

Background

According to CEQA Guidelines section 15064.4, when making a determination of the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to (1) quantify greenhouse gas emissions resulting from a project and/or (2) rely on a qualitative analysis or performance-based standards. Moreover, CEQA Guidelines section 15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

San Bernardino County GHG Reduction Plan

The County adopted its first Greenhouse Gas Reduction Plan (GHGRP) in September 2011. The GHGRP provided the GHG emissions inventory for the year 2007, and target for reducing GHG emissions 15 percent below 2007 levels by 2020. The County has implemented strategies to reduce its GHG emissions identified in the 2011 GHGRP, which has helped the County meet its 2020 GHG reduction targets. Since the adoption of County’s GHGRP, the State has enacted new climate change regulations, most notably the Senate Bill (SB) 32, which provides statewide targets to reduce GHG emissions to 40 percent below 1990 levels by 2030. To ensure conformity with the latest State climate change regulations, the County updated the 2011 GHGRP. The 2021 GHGRP Update serves as a comprehensive roadmap to outline strategies that the County will implement to continue achieving its GHG emissions reductions into the year 2030 and beyond, thereby ensuring sustainable and healthy growth.

GHG emissions impacts are assessed through the GHG Development Review Process (DRP) by applying appropriate reduction requirements as part of the discretionary approval of new development projects. Through its development review process, the County will implement CEQA requiring new development projects to quantify project GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance. A review standard of 3,000 metric tons of CO₂ equivalent (MTCO₂e) per year is used to identify projects that require the use of Screening Tables or a Project-specific technical analysis to quantify and mitigate

Project emissions.¹⁶ Note that the Mojave Desert Air Quality Management District (MDAQMD) has an annual threshold of 100,000 tons of Carbon Dioxide equivalent (CO₂e) per year.¹⁷

Impact Analysis

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

Less than Significant Impact. Per CEQA guidelines, new project emissions are treated as standard emissions, and air quality impacts are evaluated for significance on an air basin or even at a neighborhood level. Greenhouse gas emissions are treated differently, in that the perspective is global, not local. Therefore, emissions for certain types of projects might not necessarily be considered as new emissions if the project is primarily population driven. Many gases make up the group of pollutants that are believed to contribute to global climate change. However, three gases are currently evaluated carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O).

Implementation of the Emissions Reduction Plan is achieved through the DRP by applying appropriate reduction requirements to projects, which reduce GHG emissions. All new developments are required to quantify the project's GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance. A review standard of 3,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year is used to identify and mitigate Project emissions.

Greenhouse gas emissions were screened using CalEEMod version 2022. The emissions incorporate certain design reduction strategies. The CalEEMod outputs used to estimate construction and operational greenhouse gas emissions are provided in **Table 12** and **Table 13** below.

Construction activity for the Proposed Project was modeled to occur during the first quarter of 2026 and be operational in 2027. Based on the project's CalEEMod (version 2022) results, construction activity for the project would generate an estimated 481.4 metric tons of CO₂e per year. Therefore, the Proposed Project's construction emissions would not exceed the 100,000 MTCO₂e annual screening threshold defined by MDAQMD and would be consistent with the 3,000 MTCO₂e threshold established in the San Bernardino County Greenhouse Gas Reduction Plan.

Table 12
Greenhouse Gas Construction Emissions
(Metric Tons Per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O	Total
2026	437	0.01	0.01	442
2027	60.0	<0.005	<0.005	60.6
MDAQMD MTCO ₂ e Thresholds	100,000			
SB County Threshold (MTCO ₂ e)	3,000			
Total MTCO₂e	502.6			
Amortized over 30 years	16.75			
Significant	No			

¹⁶ [GHG Reduction Plan Update-Greenhouse Gas Reduction Plan Update - Adopted 9-21-2021.pdf \(sbcounty.gov\)](#)

¹⁷ MDAQMD CEQA Guidelines table 6 – p.9 February 2020 [MDAQMD California Environmental Quality Act \(CEQA\) and Federal Conformity](#)

The operational mobile emissions were calculated using the Trip Generation Analysis Impact prepared by Ganddini Group (Appendix H-1), which determined that the Proposed Project would generate approximately 542 total daily trips, with approximately 93 during AM and PM peak hours (see Table 6 in section III. Air Quality).

Table 13
Greenhouse Gas Operational Emissions by Sector
(Metric Tons Per Year)

Equipment	CO ₂	CH ₄ *	N ₂ O
Mobile	1,033	0.02	0.05
Area	2.30	<0.005	<0.005
Energy	594	0.05	<0.005
Waste	17.4	1.74	0.0
Water	44.5	1.19	0.03
Total Per Year (MTCO ₂ e)	1,691	3.00	0.09
MTCO₂e per Year	1,694.09		
MDAQMD Threshold (MTCO ₂ e)	100,000		
SB County Threshold (MTCO ₂ e)	3,000		
Significant	No		

As demonstrated, operations would not exceed the County's GHG thresholds. Therefore, Project operational activities are considered consistent with the County's Greenhouse Gas Emissions Reduction Plan. Impacts would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. According to the County of San Bernardino GHG Reduction Plan, all development projects, including those otherwise determined to be exempt from CEQA are subject to applicable Development Code provisions, including the GHG performance standards, and state requirements, such as the California Building Code requirements for energy efficiency. With the application of the GHG performance standards, projects that are exempt from CEQA and small projects that do not exceed 3,000 MTCO₂e per year will be considered consistent with the Plan and determined to have a less than significant individual and cumulative impact for GHG emissions. The GHG Reduction Plan also states that the 3,000 MTCO₂e per year value was chosen as the medial value and is used in defining small projects that must include the performance standards but do not need to use the screening tables or alternative GHG mitigation analysis.

The Project's total operational GHG emissions do not exceed the County's screening threshold of 3,000 MTCO₂e per year. Therefore, the Proposed Project is in compliance with the GHG Reduction Plan and impacts resulting from GHG emissions would be less than significant.

No significant adverse impacts have been identified or anticipated, and no mitigation is required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020

Impact Analysis

- a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less than Significant Impact. Construction of the Proposed Project would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. San Bernardino County Fire Department and the County's Department of Environmental Health regulate the use of hazardous materials. All materials required during construction would be kept in compliance with State and local regulations and BMPs. Although these materials could be stored on-site during construction activities, the Proposed Project would be required to comply

with the guidelines established by the SWPPP. The management of hazardous materials during the Proposed Project's construction phase would not result in a significant impact. Operations would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public. Impacts from operations would be less than significant. Hazardous materials are highly regulated in California, including the methods in which they are transported, used and stored. A less than significant impact is anticipated, and no mitigation measures are required.

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

Less than Significant Impact. Through the construction process, any hazardous materials used on-site would be handled and stored in accordance with all Federal, State, and County regulations. The airfield facility would store and use various chemicals for routine maintenance. However, none of these chemicals would be used in sufficient quantities to pose a threat to humans or the environment. Due to the quantities of hazardous materials being used and stored on-site would be minimal, a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials is not anticipated. Additionally, any hazardous materials would be delivered, handled, and stored in compliance with all Federal, State, and County regulations. Therefore, a less than significant impact is anticipated, and no mitigation measures are required.

- c) *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. No existing or known proposed school is within a one-quarter mile of the Project Site. The nearest school is El Mirage School located at 19250 St. Anthony Avenue approximately 2.0 miles southwest of the Project Site. Therefore, the Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or known proposed school. No impacts are identified or anticipated, and no mitigation measures are required.

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

No Impact. According to the California Department of Toxic Substances Control EnviroStor (accessed 4/17/2025), the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.¹⁸ Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

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

No Impact. The Project Site is not within an airport safety review area or Airport Runway Protection Zone¹⁹. The Proposed Project is an expansion of the existing El Mirage facility operated

¹⁸ EnviroStor. <https://www.envirostor.dtsc.ca.gov/public/map/> . Accessed April 17, 2025.

¹⁹ Countywide Plan Hazards Element Map HZ-9 Airport Safety and Planning Areas. Accessed April 17, 2025.

by General Atomics since 1985. The Project Site is not located within the vicinity of any other private or public airstrip. The nearest airport to the Project Site is Gray Butte Field, a private airfield approximately six (6) miles southwest. The Southern California Logistics Airport a public airport is located approximately eleven (11) miles southeast of the Project Site in the City of Victorville. The Project is not located within 2 miles of any neighboring public use airport. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the County of San Bernardino. Project operations would not interfere with an adopted emergency response or evacuation plan. The driveway and main entrance to the facility at El Mirage Airport Road and Linson Road would be maintained for ingress/egress at all times. A secondary access road for emergency use only is located on the south property line and proceeds south in a north/south direction as Tanner Road with access to El Mirage Road. Therefore, a less than significant impact is anticipated, and no mitigation measures are required

- g) *Expose people or structure, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less than Significant Impact. The Project Site is an undeveloped portion of a largely developed facility surrounded by open desert. There are no intermixed wildland areas within the vicinity or adjacent to the Project Site. The Project Site is not located within a High or Very High Fire Hazard Severity Zone.²⁰ The Project Site is part of an existing airfield that includes a 1.2-mile-long dual runway, administrative buildings, classrooms, hangars and over fifty accessory structures surrounded by a majority of vacant parcels. and is located over twelve miles north of the nearest high fire hazard designated area²¹.

Implementation of the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires resulting in a less than significant impact and no mitigation is required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

²⁰ Countywide Plan Hazards Element Map HZ-5 Fire Hazard Severity Zones. Accessed April 17, 2025

²¹ Countywide Plan Hazards Element Map HZ-5 Fire Hazard Severity Zones. Accessed April 17, 2025

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would?				
I. Result in substantial erosion or siltation on – or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on – or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
III. Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *Preliminary Drainage Report for General Atomics: CGCS and Hangar Facility*, April 14, 2025, Kimley-Horn (Appendix G); *Revised Geotechnical Report Update*, July 18, 2024, Merrell Johnson Geotechnical, Inc. (Appendix E); Countywide Plan/Policy Plan Hazards Element, Map HZ-4 Flood Hazards; and HZ-11 Wind Erosions Hazards

Impact Analysis

- a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Less than Significant Impact. From the Geotechnical Report, groundwater is reported at a depth greater than 21 feet below ground surface. The potential for encountering groundwater within the anticipated relatively shallow excavations is minimal. There is a potential for minor amounts of water to enter open excavations because of direct rainfall and runoff. However, groundwater is not anticipated to be affected by the proposed development. The planned on-site wastewater disposal system would be utilized and maintained properly; is not anticipated to adversely impact

the site or adjacent properties. Compliance with San Bernardino County Development Code Standards would ensure that the Proposed Project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater.

Surface water was not observed during the site reconnaissance or investigation conducted as part of the Geotechnical Investigation (Appendix E). If encountered during earthwork construction, surface water on this Project Site would be the result of precipitation or possibly some minor surface run-off from immediately surrounding areas. Overall site drainage is generally in a northeasterly direction, as directed by site topography.

The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include BMPs to prevent project-related pollutants from impacting surface waters. Therefore, impacts would be less than significant, and no mitigation measures are required.

- b) *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. According to the Geotechnical Investigation (Appendix E), Previous grading of a portion of the site for the 2017/2018 expansion stripped the original desert vegetation, constructed two retention basins, placed some localized areas of artificial fill (<2 feet), and densified the surficial soils. Based on the shallow soil data obtained from the recently excavated test pits and the deeper soil data obtained from borings drilled for a 2018 Hanger Building project located southeast of the Project Site, the Project Site is underlain by medium dense silty sand, sand with silt, and clayey sand. Below this depth, the site is underlain by alternating layers of silty sand, poorly graded sand with silt, and occasional thin layers of fat clay to the maximum depth explored, 51.5 feet. The moisture content tends to increase with depth.

Groundwater was encountered during Merrell Johnson's field exploration at a depth of approximately 43-feet below the existing ground surface.²² Based on a review of information contained on the California Department of Water Resources, Water Data Library²³, and the USGS Water Resources of the United States, groundwater is reported at a depth of 21 feet below ground surface.²⁴ All new water wells will be required to adhere to the San Bernardino County Public Health Division of Environmental Health Services including the Desert Groundwater Management Ordinance (DGMO) County Ordinance 33.06551 et al.²⁵ to ensure that the system will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Less than significant adverse impacts are anticipated, and no mitigation measures are required.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would?*
- I. *Result in substantial erosion or siltation on – or off-site;*
 - II. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;*

²² General Atomics Drainage Report, Appendix G, p.4

²³ California Department of Water Resources Water Data Library [Map](#)

²⁴ Geotechnical Report, Appendix E, p.3

²⁵ [Water Wells – Environmental Health Services \(sbcounty.gov\)](#)

III. Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or

- I. Less than Significant Impact.* The Proposed Project is within a High Erodibility Zone according to the County of San Bernardino Countywide Plan/Policy Plan Hazards Policy Map: *HZ-11 Wind Erosions Hazards*.²⁶ The Project Site is highly developed with an operating airfield and training Center. Any further conversion to paved surfaces would generally help to reduce the potential for soil erosion from the site during operation. Compliance with any required permitting and/or site-specific SWPPP, associated BMPs, and MDAQMD Rule 403, would reduce the Project's impacts related to soil erosion to less than significant. According to the Preliminary Drainage Report prepared by Kimley-Horn (Appendix G), the Proposed Project will not substantially alter the existing drainage pattern that would result in substantial erosion or siltation or runoff on- or off-site. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- II. Less than Significant Impact.* According to the Preliminary Drainage Report prepared by Kimley-Horn (Appendix G), the airfield expansion proposed does not include any storm drain structures but will rather be graded to sheet flow into the existing basin that serves the entire airfield facility. The development of the existing vacant site into the proposed development is not expected to result in a significant impact to downstream systems for storms up to the 100-year condition. The mitigated development discharges less stormwater flows than the existing site conditions.

Existing earthen channels, which are connected by existing culverts, collect and divert runoff into existing basins located within the El Mirage airfield limits. The Project proposes to discharge to the existing channel/basin located northwest of Project improvements. Based on the previously approved report prepared by Kimley-Horn and Associates Inc. (Kimley-Horn) on December 3rd, 2018, the existing "Channel and basin system is oversized by a volume of 1.38 acre-feet (ft)" (Kimley-Horn, 2018). Considering the 0.22 acre-ft of volume generated/required for the disturbed area in the 2018 improvements, the remaining channel/basin capacity is 1.16 acre-ft. The required mitigated volume for the project improvements was calculated to be 0.54 acre-ft. Since the basin has the capacity to store the additional volume from post-development conditions, the proposed development does not expect to cause a significant impact to downstream systems in the event of a 100-year design storm.

Therefore, the Proposed Project will not substantially alter the existing drainage pattern that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- III. Less than Significant Impact.* The Preliminary Drainage Report (Appendix G) finds that the existing channel/basin has an excess capacity of 1.16 acre-ft. The required mitigated volume for the project improvements was calculated to be 0.54 acre-ft. Since the basin has the capacity to store the additional volume from post-development conditions, the proposed development is not expected to cause a significant impact to downstream systems in the event of a 100-year design storm.

An existing stormwater detention system has been designed (see Preliminary Drainage Report, Appendix G) to detain flows from a 100-year event and reduce the release of stormwater off-site to match existing conditions. Further, the Proposed Project is not anticipated to create or

²⁶ San Bernardino County Policy Plan, Hazard Element Map *HZ-11 Wind Erosion Hazards*

contribute runoff water which would provide substantial additional sources of polluted runoff. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

No Impact. As shown by San Bernardino County Hazards Element *Map HZ-4 Flood Hazards* – The Project Site is not located within Flood Plain Safety (FP) Overlay District or within a dam inundation area.²⁷ Tsunamis are large waves generated in open bodies of water by fault displacement of major ground movement. Due to the inland location of the Project Site, tsunamis are not considered to be a risk. Seiches are standing waves generated in enclosed bodies of water in response to ground shaking. The Project Site is not located in the immediate vicinity of a known large body of water or water storage facility and therefore impacts from potential seiches are not anticipated. Therefore, the Proposed Project is not anticipated to risk release of pollutants due to project inundation. No impacts are identified or are anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

²⁷ San Bernardino County Policy Plan; Hazards Element, *Maps HZ-4 Flood Hazards*

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020

Impact Analysis

a) Physically divide an established community?

No Impact. The physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development was built which was inconsistent with the land uses in the community such that it divided the community. The environmental effects caused by such a facility or land use could include lack of, or disruption of, access to services, schools, or shopping areas. It might also include the creation of blighted buildings or areas due to the division of the community.

The Proposed Project involves the construction and operation of three structures with a total of approximately 140,000 square feet as accessory to an existing airfield facility that has been operated by General Atomics since 1985. Therefore, implementation of the Proposed Project would not physically divide an established community, and no impacts would occur.

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

Less than Significant Impact. The Proposed Project parcel currently has a Policy Plan land use designation of Rural Living (RL) and zoning of Rural Living (RL). With the adoption of the Policy Plan in 2020 the land use of the majority of the airfield facility (5 of the 7 parcels) was changed to General Industrial (GI). The two easternmost parcels that total 160 acres (where the Project Site is located) remained RL. However, the existing facility structures on those two parcels are considered legal non-conforming uses as accessory to the main facility and were allowed with approval of a previous CUP in 2018.

The Proposed Project's three structures are also accessory to the existing airfield facility that has been operated by General Atomics since 1985 and are considered legal non-conforming uses, allowed with approval of the current CUP application. Therefore, a Policy Plan land use designation amendment or zone change is not required. Thus, the Proposed Project would not conflict with any applicable land use plan, policy or regulation. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; Policy Plan Natural Resources Element, Map *NR-4 Mineral Resource Zones*

Impact Analysis

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

Less than Significant Impact. In 1975, the California Legislature enacted the Surface Mining and Reclamation Act (SMARA), which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into four Mineral Resource Zones (MRZs):

- MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence;
- MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence;
- MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated; and
- MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

The San Bernardino Countywide Plan Natural Resources Element Map *NR-4 Mineral Resource Zones* designates the Project Site as being located within MRZ-3. The Project Site has been used as an airfield since the early 1940's and has not previously been used for mineral extraction. As such, the Proposed Project would not result in the loss of availability of a known mineral resource as the mineral resource was not previously available for extraction. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. As discussed previously, the Project Site is within an MRZ zone within the County's Policy Plan. However, no mineral extraction activities occur on the site currently, or historically. The site has been developed as a private airfield for over 85 years. As

such, the Proposed Project would not result in the loss of availability of a known mineral resource as the mineral resource was not previously available for extraction. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration of groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; Policy Plan Hazards Element, Map HZ-9 Airport Safety & Planning

Impact Analysis

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

Less than Significant Impact. The Proposed Project consists of the construction and operation of three accessory structures to support an existing airfield that has been in existence on this site since the 1940s as Mirage Auxiliary No.3, and in operation under General Atomics since 1985. The facility operations include manufacturing, training, testing, and operating large, unmanned aircraft (drones).

The airfield facility is mainly surrounded by vacant desert land with the exception of one residence approximately 1.13 miles to the southeast of the proposed disturbance area and one residence approximately 1.2 miles to the southwest of the proposed disturbance area, one residence approximately 1.28 miles west of the disturbance area and one commercial operation (unconfirmed) adjacent to the south. The existing flight operations could affect any noise sensitive land uses within the area, as would adjacent roadways with the entering and exiting of employees at the single point of access on Linson Road and El Mirage Airport Road (see site plan) which is approximately 0.67 miles southeast of the aforementioned single-family residence. However, as proposed, the Project is being developed as accessory to a

use that has previously existed, and no "neighboring inhabitant" is within 200 yards of the Project Site boundary.²⁸

The Project is not expected to generate a substantial increase in ambient noise levels in the Project vicinity above levels existing or allowed without the Project. Potential noise impacts could occur if the Project associated mobile noise sources (such as aircraft) exceed interior noise standards of the Day Night Average Sound Level (Ldn (DNL)) or Community Noise Equivalent Level (CNEL) of 45 dBA and an exterior noise standard or CNEL of 60 dBA as stipulated in the San Bernardino Development Code and discussed in the San Bernardino Countywide Plan Draft PEIR ²⁹. The potential for an increase in noise levels may occur anywhere within the airfield's traffic pattern and anywhere air traffic is below 500 feet.

Although the expansion of the facility would be expected to nominally increase noise in the immediate area of the project, it would not be expected to have a perceptible increase in ambient noise levels at any of the nearest existing sensitive uses (residential). The ambient noise levels in the area would not increase or violate the San Bernardino Development Code, or Countywide Plan Noise Element to a level that is higher than already exists due to the addition of the hangar, control building and stockroom buildings as proposed with this Project. Therefore, less than significant impacts would occur.

b) Generation of excessive groundborne vibration of groundborne noise levels?

Less than Significant Impact. County Development Code Section 83.01.090, Vibration, establishes standards for acceptable vibration levels: temporary construction, maintenance, repair, or demolition activities between 7 a.m. and 7 p.m. are exempt from this vibration limit, except on Sundays and federal holidays, when construction is prohibited. Potential impacts due to groundborne vibration or noise would be short-term and temporary during construction. Motor vehicle use during Project operation is also exempt from the County vibration standards. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

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 airfield opened in 1942 as a satellite field for the Victorville AAF and was used as a training facility during World War II. After the war, the field was used as a civil airfield. From the 1980's to present day, the El Mirage Field has been used by General Atomics as a private unmanned air vehicle flight test center. The Project is not located within an airport land use plan or located within two miles of a public use airport resulting in exposure to excessive noise levels to people residing in the area. Given the Projects remote location, there would be no impact.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

²⁸ Neighboring Inhabitant is defined as any individual residing within 200 yards of a property that is alleged to be the source of noise in violation of Chapter 7 of the San Bernardino County Development Code, [CHAPTER 7: NOISE ABATEMENT AND CONTROL](#)

²⁹ Countywide Draft PEIR p. 5.12-6 accessed March 12, 2025 [Ch 05-12-N.pdf](#)

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020

Impact Analysis

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

No Impact. As described previously, the Project Site consists of the construction and operation of three structures to support an existing airfield facility. The previous CUP for the hangar and accessory structures approved in 2018 accounted for 300 new employees. Approximately 150 were hired at that time. The new facilities will be used by existing and new employees resulting in a net zero increase of employees from what was previously analyzed. The Project will not induce population growth in the area either directly (as it does not propose new housing) or indirectly (it does not create a significant number of new jobs). No impact is expected.

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

No Impact. The Proposed Project will be constructed on an established airfield facility that does not include or necessitate the construction or replacement of housing. Therefore, no impact would occur, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Recreation/Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020;

Impact Analysis

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

i. Fire Protection

Less than Significant Impact. According to the San Bernardino Countywide Plan, fire protection, and emergency medical service in the Project area are provided by the San Bernardino County Fire Department. The closest county fire stations are the El Mirage Fire station at 2925 El Mirage Road approximately 1 mile south of the Project Site and Adelanto Station #322 at 10370 Rancho Road Adelanto, CA., approximately 9.6 miles southeast of the Project Site. Increased property and sales tax associated with the direct and indirect improvement of the property would provide funding for necessary services increased associated with overall growth and development in the region. The Proposed Project would receive adequate fire protection services and would not result in the need for new or physically altered fire protection facilities.

ii. Police Protection

Less than Significant Impact. The San Bernardino County Sheriff Victor Valley Sheriff Station located at 11613 Bartlett Avenue Adelanto, CA., approximately 10 miles southeast of the Project Site, and Phelan Substation at 4050 Phelan Road Phelan, CA., approximately 13.5 miles south of the Project Site provides law enforcement services to the community of El Mirage, and several other communities including the City of Adelanto as well as surrounding unincorporated communities of the Victor Valley area. These patrol areas cover a wide range of mountainous and remote desert terrain, with heavy to sparsely populated rural and urban regions that also contain commercial and industrial areas with a population over 56,000 in the unincorporated areas and over 35,000 in the City of Adelanto.

Although an increase in employees would result from implementation of the Project, the need for law enforcement services from the Proposed Project would not be significant when compared to the current service levels of the San Bernardino County Sheriff Department and the relatively small size of the Proposed Project when compared to existing facility. The additional employees that are expected to be generated from the full operation of the Proposed Project would not require the construction or expansion of existing police facilities. Increased property and sales tax associated with the direct and indirect improvement of the property would provide funding for necessary services increased associated with overall growth and development in the region. Therefore, less significant impacts are identified or anticipated, and no mitigation measures are required.

iii. Schools

No Impact. The closest school to the Proposed Project is El Mirage School located approximately 2.75 miles southwest of the Project Site at 19250 Saint Anthony Avenue, Adelanto, CA within Adelanto School District that serves the El Mirage community. As the Proposed Project does not include housing, it is not expected that construction and operation of new school facilities would be necessary due to implementation of the Proposed Project. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

iv. Parks

No Impact. The Proposed Project would not induce population growth thus would not create the need for the creation or expansion of recreation or park facilities. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

v. Other Public Facilities

Less than Significant Impact. The Project would not 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, or the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services, including fire and police protection, schools, parks, or other public facilities. The Proposed Project would increase property tax revenues to provide a source of funding that is sufficient to offset any increases in the anticipated demands for public services generated by this Project. Therefore, less than significant impacts would occur.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020

Impact Analysis

- 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 will not 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. The Project will not generate any new residential units and the impacts to parks if any would be inconsequential. Therefore, there would be no impact from implementation of the Project that would result from the contribution to deterioration of parks and recreational facilities and no mitigation would be required.

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

No Impact. The Proposed Project does not include recreational facilities nor will the Project result in an increased demand for recreational facilities. Therefore, the Proposed Project would not require the construction or expansion of other recreational facilities that might have an adverse physical effect on the environment. No impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *Transportation Screening Assessment (Scope for Traffic Study)*, Ganddini Group, Inc. March 28, 2025. (Appendix H); *Trip Generation Analysis*, Ganddini Group, Inc. July 8, 2025. (Appendix H-1).

Impact Analysis

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

No Impact. The remote location of the El Mirage Airfield is not a part of a program, plan or ordinance that addresses the circulation system of El Mirage. Regional access to the Project Site is provided by El Mirage Road to northbound El Mirage Airport Road to the facility at Linson Road. Key roadways providing local circulation include El Mirage Road, State Highway 18 (Pearblossom Highway) to the south, and Highway 395 to the east. There are no current or planned bicycle pathways in the project vicinity. There are also no existing sidewalks fronting the Project Site. The San Bernardino Countywide Plan does not include a plan or policy related to bikeways and trails in the vicinity of the Project Site. Therefore, no conflict with a program plan, ordinance, or policy addressing the circulation system, including bicycle and pedestrian facilities are anticipated. Further, the Project Site is not within the service area of a public transportation system. Thus, there would be no conflict. No impact is expected, and no mitigation is required.

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

Section 15064.3 subdivision (b) of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized

travel. Except as provided in subdivision (b)(2), a project's effect on automobile delay shall not constitute a significant environmental impact.³⁰

Less Than Significant Impact. The County TIS Guidelines identify screening criteria for certain types of projects that typically reduce vehicle miles traveled (VMT) and may be presumed to result in a less than significant VMT impact. To qualify for VMT screening, the Project need only satisfy one of the following screening criteria:

- Local serving land uses
- Projects which generates less than net new 110 daily vehicle trips
- Projects located within a Transit Priority Area (TPA)
- Projects located within a low VMT area.

Local Serving Land Use Screening

The County TIS Guidelines lists the following projects that serve the local community, have the potential to reduce VMT, and thus are not required to complete a VMT assessment:

- Local-serving K-12 schools
- Local-serving retail less than 50,000 square feet
- Local parks
- Day care centers
- Local serving gas stations
- Local serving banks
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS.

The Proposed Project does not include any of the local serving land uses specified above; therefore, the project does not satisfy the "local servicing land use" screening criteria.

Trip Generation Based on Observed Counts

Since the proposed project is for aviation services in a rural area for a facility that uses a flex-hour work schedule to reduce employee trips during the peak hours, the trip generation rates for the Proposed Project were determined by vehicle counts conducted at the existing 144,610 square feet facility operated by the applicant. The 24-hour, bi-directional trip counts for a typical weekday with cars and truck classification by number of axles was conducted at the General Atomics driveway within the El Mirage Airport in April 2025 to document the number of trips generated by the existing General Atomics facility. Based on the observed classified trip counts, AM peak hour, PM peak hour and daily trip generation rates for the site were determined including passenger car and truck-trailer trips.

The existing trip generation based on observed counts which resulted in approximately 498 daily trips, including 28 trips during the AM peak hour and 58 trips during the PM peak hour.

³⁰ Association of Environmental Professional 2025 CEQA Statute and Guidelines Section 15064.3 (b).

Trip Generation Proposed Project

The Project trip generation was also calculated in terms of Passenger Car Equivalent (PCE) trips. Truck-trailer trips were converted to PCE trips based on the PCE factors as recommended in the County of San Bernardino Congestion Management Program: 1.5 for 2-axle light-duty trucks, 2.0 for 3-axle medium-duty trucks, and 3.0 for 4+-axle heavy-duty trucks and light-duty truck-trailer combinations. The Project trip generation forecast is based on average rates for the general aviation expansion determined from the counts at the existing facility at the site. The Proposed Project is forecast to generate approximately 542 daily trips, including 30 trips during the AM peak hour and 63 trips during the PM peak hour which is equivalent to 635 daily PCE trips, including 39 PCE trips during the AM peak hour and 70 PCE trips during the PM peak hour (see Appendix H-1).

The Proposed Project also satisfies the County-established level of service (LOS) screening criteria for projects generating fewer than 100 peak hour trips. Therefore, the Proposed Project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established LOS screening criteria. Less than significant impacts are expected, and no mitigation is required.

Transit Priority Area (TPA) Screening

Defined within the Trip Generation Analysis, a TPA is considered to be within one-half mile of a major transit stop or high-quality transit corridor.^{31, 32} Projects located within may be presumed to result in a less than significant VMT impact, absent substantial evidence to the contrary. The County TIA Guidelines note that this screening criteria may not apply if the project has a floor area ratio (FAR) less than 0.75, the project is inconsistent with applicable Sustainable Communities Strategy, or the project constructs a smaller number of moderate or high-income residential units than the existing number of affordable residential units.

Based on a review of the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool, the Proposed Project is not located within a TPA; therefore, the TPA screening criteria is not met.

Low VMT Area Screening

As prescribed in the County TIA Guidelines, the SBCTA VMT Screening Tool was used to assess low VMT area screening for the project. The VMT Screening Tool was developed using the County travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs) within the County transportation region. TAZs are geographic polygons similar to census block groups used to represent areas of homogenous travel behavior. Total daily VMT per service population was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

³¹ A major transit stop is defined as an existing rail transit station, ferry terminal with bus or rail service, or the intersection of two or more major bus routes with less than 20-minute headways during the peak commute hours (Pub. Resources Code, § 21064.3 and AB 2553).

³² Fixed route bus service with less than 15-minute headways during the peak commute hours (Pub. Resources Code, § 21155).

Based on the VMT Screening Tool results for the Project Site, located within TAZ 53891102, the baseline year (2025) VMT per worker for the Project TAZ is equal to 13.8, which is four percent (4%) or more below the County baseline (23.0 VMT per worker) or the threshold of 22.1 VMT per worker.

The Proposed Project satisfies the County-established vehicle miles traveled (VMT) screening criteria for projects located in a Low VMT area screening criteria. Therefore, preparation of a transportation impact study with vehicle miles VMT analysis is not warranted, and the proposed may be presumed to result in a less than significant VMT impact.

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

No Impact. The Project will not substantially increase hazards due to a design feature or incompatible use. The Proposed use is the addition of a 118,020-hangar building and accessory structures for a total of approximately 157,532 sf on the portion of the airfield facility that has been developed and in operation since 2018. Necessary infrastructure including roads is already in place and will be utilized for the new Project. There are no incompatible uses proposed with the Project that would include alterations to traffic infrastructure and patterns. No impacts are identified or anticipated, and no mitigation measures are required.

- d) *Result in inadequate emergency access?*

Less than Significant Impact. Primary access to the Project Site would be provided via a gated driveway entrance at Linson Road and El Mirage Airport Road. Internal roads will provide for a two-way path of travel with direct access to all buildings as well as paved vehicle parking areas throughout the Project Site. A secondary access road for emergency use only is located on the south property line and proceeds south in a north/south direction as Tanner Road with access to El Mirage Road. This was established under a previously approved CUP in 2018. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

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

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; *Cultural Resources Study for the General Atomics Aeronautical Systems Project*, June 27, 2025, BFS A Environmental Services, a Perennial Company. (Appendix C); *Paleontological Assessment for the General Atomics Aeronautical Systems Project*, June 27, 2025, BFS A Environmental Services, a Perennial Company (Appendix F).

Regulatory Framework

Effective July 1, 2015, Assembly Bill 52 (AB 52) amended CEQA to require that: 1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and 2) for any tribe that responded to the notice within 30 days of receipt with a request for consultation, the lead agency must consult with the tribe. Topics that may be addressed during consultation include Tribal Cultural Resources (TCRs), the potential significance of project impacts, the type of environmental document that should be prepared, and possible mitigation measures and project alternatives.

Pursuant to AB 52, Section 21073 of the Public Resources Code defines California Native American tribes as "a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes.

Section 21074(a) of the Public Resource Code defines TCRs for the purpose of CEQA as:

1. Sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. included or determined to be eligible for inclusion in the California Register of Historical Resources; and/or
 - b. included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; and/or
 - c. 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.

Because criteria a and b also meet the definition of a historical resource under CEQA, a TCR may also require additional consideration as a historical resource. TCRs may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their tribal cultural resources and heritage, AB 52 requires that CEQA lead agencies provide tribes that requested notification an opportunity to consult at the commencement of the CEQA process to identify TCRs. Furthermore, because a significant effect on a TCR is considered a significant impact on the environment under CEQA, consultation is used to develop appropriate avoidance, impact minimization, and mitigation measures.

Summary of AB 52 Consultation

On May 20, 2025, the County of San Bernardino initiated environmental review under CEQA for the Proposed Project. Opportunity to consult letters were sent to the following California Native American tribes, which had previously submitted general consultation request letters pursuant to 21080.3.1(d) of the Public Resources Code:

- Colorado River Indian Tribe
- Fort Mojave Indian Tribe
- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrieleno Tongva San Gabriel Band of Mission Indians
- Morongo Band of Mission Indians
- Soboba Band of Luiseno Indians Twenty-Nine Palms Band of Mission Indians
- Yuhaaviatam of San Manuel Nation

Each recipient was provided with a brief description of the Proposed Project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation. The 30-day response period concluded on June 26, 2025.

Sacred Lands File Record Search

A search of the Sacred Lands File by the Native American Heritage Commission (NAHC) in Sacramento, California was requested by BFSA. This search was requested to determine whether there are sensitive or sacred Native American resources in the vicinity of the Project area that could be affected by the Proposed Project. The NAHC was also asked to provide a list of Native

American groups that have historic or traditional ties to the Project area who may have knowledge about the Project area. The results of the search of the Sacred Lands File by the NAHC did not indicate the presence of any Native American cultural resources within one mile of the Project area. The NAHC also provided a list of nine Native American groups that have historic or traditional ties to the Project area who may have knowledge about the Project area. It should be noted that this does not constitute consultation in compliance with AB 52.

Impact Analysis

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

Less than Significant with Mitigation Incorporated. As concluded in Section 5(a), above, the Historical/Archaeological Resources Survey Report concluded that no “historical resources” are anticipated to be impacted by the Proposed Project. However, the possibility of discovering a significant unanticipated find remains and therefore Mitigation Measure **CUL-1** shall be implemented to ensure that less than significant impacts to potential historical resources occur. No additional mitigation measures are required.

- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

Less than Significant with Mitigation Incorporated. No TCRs were identified within the project area during AB 52 consultation. The Proposed Project would not result in significant impacts to known TCRs. However, as a result of AB 52 consultation the Tribes identified a potential for the discovery of unknown TCRs during construction, which may result in a significant impact if such resources are found and affected. Impacts to unknown TCRs would be less than significant with the implementation of mitigation measures **TCR-1** through **TCR-14**.

Mitigation Measures

Morongo Band of Mission Indians (MBMI) Mitigation Measures

TCR-1 (MOR): Native American Treatment Agreement. Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Agreement with the Morongo Band of Mission Indians for the project. The Tribal Monitor(s) shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources and/or tribal cultural resources.

TCR-2 (MBMI): Retention of Archaeologist. Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist will conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the

archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.

TCR-3 (MBMI): Cultural Resource Management Plan. Prior to any ground-disturbing activities the project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the Consulting Tribe[s] and at minimum, shall include the following: (1) the approved Mitigation Measures (MM)/Conditions of Approval (COA), (2) procedures for each MM/COA, (3) the contact information for all pertinent parties, (4) parties' responsibilities, and (5) an overview of the project schedule.

TCR-4 (MBMI): Pre-Grade Meeting. The retained qualified archeologist and Consulting Tribe[s] representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.

TCR-5 (MBMI): On-site Monitoring. During all ground-disturbing activities the qualified archaeologist and the Tribal Monitor(s) shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Tribal Monitor(s), shall be responsible for determining the duration and frequency of monitoring.

TCR-6 (MBMI): Inadvertent Discovery of Cultural Resources. In the event that previously unidentified cultural resources are discovered /unearthed during construction, the qualified archaeologist and the Tribal Monitor(s) shall have the authority to temporarily divert and/or temporarily halt ground-disturbance activities in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored ground-disturbing activity can proceed.

If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find(s), so that it/they can be evaluated by the qualified archaeologist and Tribal Monitor[s]. The archaeologist shall notify the Lead Agency and Consulting Tribe[s] of said discovery. The qualified archaeologist, in consultation with the Lead Agency, the Consulting Tribe[s], and the Tribal monitor, shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the qualified archaeologist in consultation with the Tribe[s] and the Tribal monitor[s] and be submitted to the Lead Agency for review and approval.

Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance.
- B. If avoidance is not feasible, Preservation in place.

If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.

- C. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (36 CFR 79).

Unless otherwise agreed upon by all parties, all removed items from the Project shall be temporarily curated on-site in a secure and locked location (i.e., Conex box, a lockable office or drawer with restricted access to it, etc.). A periodic inventory must be maintained and provided to Consulting Tribe[s].

TCR-7 (MBMI): Inadvertent Discovery of Human Remains. The Morongo Band of Mission Indians requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. No photographs are to be taken except by the coroner, with written approval by the Consulting Tribe[s].

- A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected by the establishment of an ESA with a marked boundary. Project personnel/observers will be restricted from entry into the ESA. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.
- B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
- C. The NAHC shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98
- D. If the Morongo Band of Mission Indians has been named the MLD or Co-MLD, the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's MLD, the landowner, and the City Planning Department.

TCR-8 (MBMI): FINAL REPORT. The final report[s] created as a part of the project (CRMP/AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe[s] for review and comment. After approval of all parties, the final reports are to be submitted to the appropriate Information Center (IC), and the Consulting Tribe[s].

Yuhaaviatam of San Manuel Nation (YSMN) Mitigation Measures

TCR 9 (YSMN): Monitoring and Treatment Plan. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project.

Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR 10 (YSMN): Archaeological Monitoring. Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

TCR 11 (YSMN): Worker Environmental Awareness Program. Prior to project initiation, a qualified archaeologist should be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training should be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Tribal representatives from the Consulting Tribes, such as Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians) will be allowed to attend and/or participate in the WEAP training should they elect to and will be given ten days' notice prior to the training. Archaeological sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

TCR-12 (YSMN) Tribal Monitoring. Due to the heightened cultural sensitivity of the proposed project area, at the discretion of the consulting tribe(s), Tribal monitor(s) authorized to represent YSMN shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). At the discretion of the consulting tribes, a sufficient number of Tribal monitors shall be present each workday to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. Any YSMN Tribal Monitors who access the site shall obtain or possess: (1) security clearance from General Atomics (Tribal Monitor is required to provide either a passport or original birth certificate with accompanying government issued picture ID), (2) Certificate of liability workers compensation and general liability insurance per provided template, with property owner and contractor named as additionally insured, (3) OSHA 30 training certificate, (4) Cal OSHA training certificate, (5) Red cross CPR certificate, (6) professional protective equipment, and (7) Tribal certification/verification. Any Tribal Monitors shall be required to schedule an appointment everyday they monitor the site. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist, as detailed within TCR-9, and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN). Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR-13 (YSMN) Treatment of Cultural Resources During Project Implementation. If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities

shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.

The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by YSMN. All plans for analysis shall be reviewed and approved by the applicant and YSMN prior to implementation, and all removed material shall be temporarily curated on-site.

It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process/location and shall include measures and provisions to protect the reburial area from any future impacts.

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and YSMN for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency and YSMN.

TCR-14 (YSMN): Inadvertent Discoveries of Human Remains. If human remains are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

Possible significant adverse impacts have been identified and may occur therefore compliance with Mitigation Measure TCR-1 and TCR-14 would reduce possible impacts to a less than significant level.

XIX. UTILITIES AND SERVICE SYSTEMS

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

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020

Impact Analysis

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

Less than Significant Impact. With approval of a Conditional Use Permit (CUP), the Project Site would be developed as accessory structures to an existing airfield facility. The Project Site would require existing private wells for water and an on-site septic system for sewer/wastewater. Any expansion to capacity or availability of those utilities would be implemented per County design standards and reviewed by County Environmental Health Services (EHS) before building permits are issued. Existing utilities for natural gas, electricity, telecommunications will continue to be provided by Southern California Gas (SoCal Gas), Southern California Edison (SCE), and Frontier or Spectrum/Charter respectively. Additional storm water drainage is addressed in Appendix G and will be reviewed and approved by the County Land Development Division prior to issuance of grading permits. Therefore, less than significant impacts are anticipated, and no mitigation measures are required.

- b) *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. Implementation of the Proposed Project would require the use of existing private wells. Approval of new wells would be dependent on well production rates being sufficient to meet the Proposed Project's demands and no interference with the use of other nearby wells. All new water wells will be required to adhere to the San Bernardino County Public Health Division of Environmental Health Services including the Desert Groundwater Management Ordinance (DGMO) County Ordinance 33.06551 et al.³³ to ensure that the system will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. No significant adverse impacts are anticipated, and no mitigation measures are required.

The Project Site is not located within the area of an adjudicated groundwater basin. Prior development of the Project Site has been reliant on groundwater from onsite wells. Water supplies are therefore expected to be sufficient to serve the Proposed Project. Impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. The proposed structures will utilize an existing on-site wastewater system. The County's Division of Environmental Health (DEHS) will approve and oversee any new request for an Onsite Wastewater Treatment System (OWTS). Septic system pumpers must be approved by DEHS. Septage, the waste or sewage in a septic tank, is accepted at the Barstow Sanitary Landfill which is approximately 30 miles northeast of the site. Less than significant impacts are expected and no mitigation measures are required.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. Solid waste generated at the Project Site would be taken to the Victorville Sanitary Landfill 18600 Stoddard Wells Road Victorville, approximately 18 miles east of the Project Site. The Victorville Landfill has a maximum throughput of 3,000 tons per day, an expected operational life through 2081, and a remaining capacity of 79,400,000 cubic yards. Based on CalRecycle Service Sector Generation Rates, the Proposed Project would generate approximately 88.5 pounds of solid waste per day using a rate of 0.59 per employee/per day which is 2.95 percentage of the maximum tonnage per day that the Victorville Landfill can accept. The Proposed Project's generation of solid waste would be less than significant, and no mitigation measures are required.

- e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant Impact. The Project developer shall provide adequate space and storage bins for both refuse and recycling materials. This requirement is to assist the County in compliance with the recycling requirements of Assembly Bill (AB) 2176. A Construction Waste Management Plan would be prepared in two parts to show adequate handling of waste

³³ [Water Wells – Environmental Health Services \(sbcounty.gov\)](http://www.sbcounty.gov/water-wells-environmental-health-services)

materials: disposal, reuse, or recycling as required by the County Department of Public Works Solid Waste Management Department.

The purpose of California Assembly Bill 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills by recycling. It mandates businesses and public entities generating 4-cubic yards or more of trash to establish and maintain recycling services. The County of San Bernardino Solid Waste Management Division reviews and approves all new construction projects that require a Construction and Demolition Solid Waste Management Plan (waste management plan).

A project's waste management plan consists of two parts which are incorporated into the Conditions of Approval (COA's) by the County of San Bernardino Solid Waste Management Division. As part of the plan, Proposed Projects are required to estimate the amount of tonnage to be disposed of and diverted during construction. Disposal/diversion receipts or certifications are required as a part of that summary.

The Proposed Project would comply with all federal, State, and local statutes and regulations related to solid waste. Solid waste produced during the construction phase or operational phase of the Proposed Project would be disposed of in accordance with all applicable statutes and regulations. Therefore, impacts would be less than significant, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XX. WILDFIRE

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

Substantiation

San Bernardino County Countywide Plan/Policy Plan 2020; Policy Plan Hazards Element, Map HZ-4 Flood Hazards, and Map HZ-5 Fire Hazard Severity Zones

Impact Analysis

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The undeveloped portion of the Project Site is within a moderate Fire Hazard Severity Zone, and CalFire Local Responsibility Response Area, while the developed areas are classified as “Urban Unzoned”, according to the Countywide Plan Policy Map HZ-5 *Fire Hazard Severity Zones*. The subject parcel is within a sparsely populated area of the desert surrounded by vacant land. The Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The Project Site is not located within a Very High Fire Hazard Severity Zone according to map HZ-5 *Fire Hazard Severity Zones* of the Hazards Element of the Policy Plan. The Project parcel is adjacent to one parcel to the west that contains one single family residence approximately 1.28 miles west of the Project development area, and

one commercial operation to the south. Parcels to the north and east are vacant. No wildlands occur within the vicinity. Due to the lack of wildfire fuel factors within the Project Site, the risk of wildfires is low. Implementation of the Proposed Project would not cause a significant impact due to slope, prevailing winds, and other factors, exacerbate wildfire risks, thereby exposing Project occupants to pollutant concentrations from wildfire or the uncontrolled spread of a wildfire. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The Project Site is located within CalFire Local Responsibility Area, and not within a Very High Fire Hazard Severity Zone³⁴. The Proposed Project does not include the installation or maintenance of associated infrastructure that would exacerbate fire risk. The proposed improvements would be made in accordance with development standards per the San Bernardino County Development Code, and County Fire Department development standards as well as California Fire Codes. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The topography of the Project Site is relatively level with elevations of the 800-acre site ranging between 2,845 and 2,870 amsl. As shown on Policy Map HZ-4 of the Policy Plan, the Project Site is not identified in an area associated with risk of wildland fire. The Project Site lies within Flood Zone D according to FEMA Flood Insurance Rate Map (FIRM) panel 06071C5775H. Flood hazards are undetermined in the area but possible. According to map HZ-4 *Flood Hazards Map* the Project Site is not located within a 100-year FEMA Flood Zone Area, but is within a DWR 100-year Flood Awareness area.

There are no dams, reservoirs, or large water bodies near the Project Site. The Project Site is not anticipated to 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. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

³⁴ San Bernardino County. County Policy Plan web maps: HZ-6 "Fire Responsibility Areas."

MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact with Mitigation Incorporated. The results of the Initial Study show that there are potentially significant impacts to Biological Resources and Cultural Resources. These impacts will be reduced to less than significant levels after incorporation of Biological Resource mitigation measure **BIO-1, BIO-2 and BIO-3**, and Cultural Resource mitigation measure **CUL-1**. Therefore, the Proposed Project will not substantially degrade the quality of the environment and impact on habitat, wildlife populations, plant and animal communities, rare and endangered species or important examples of the major periods of California history or prehistory; no additional mitigation is warranted. Also, no Tribal Cultural Resources (TCRs) were identified within the project area during AB 52 consultation. The Proposed Project would not result in significant impacts to known TCRs. However, as a result of AB 52 consultation, the Tribes identified a potential for the discovery of unknown TCRs during construction, which may result in a significant impact if such resources are found and affected. Impacts to unknown TCRs would be less than significant with the implementation of Mitigation Measures **TCR-1** through **TCR-14**.

- 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)?

Less than Significant Impact. Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor but collectively significant developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

The Proposed Project is the addition of a 118,020-sf hangar building and accessory structures that will total approximately 157,532 sf on the existing El Mirage Airfield, which has been in operation since 1985. The airfield is approximately 10 miles west of the city of Adelanto on El Mirage Airport Road and Linson Road. Land surrounding the 800 acre facility is largely vacant with a few scattered residences. The nearest being approximately 1.13 miles southeast of the proposed disturbance area for the current Project. Impacts associated with the Proposed Project would not be considered individually adverse or unfavorable. The Proposed Project is a conditionally acceptable use as it will be an expansion of an existing use to support the airfield. No cumulative impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact with Mitigation Incorporated. Implementation of the existing rules and regulations, conditions from permit approvals and the mitigation measures identified in this Initial Study checklist would result in a less than significant impact due to the Projects implementation. Greenhouse gas emissions will not to exceed the County threshold of 3,000 MTCO₂e and will not require implementation of mitigation measures. Through incorporation of design measures, County policies, standards, and guidelines indicates there shall be no substantial adverse effects on human beings, either directly or indirectly. No such impacts have been identified by the studies conducted for this Project that cannot be mitigated. There would be no substantial adverse effects on human beings, either directly or indirectly.

SUMMARY OF MITIGATION MEASURES

The following mitigation measures summarized below were identified to reduce potential impacts to less than significant:

BIOLOGICAL RESOURCES:

BIO-1: A Western Joshua Tree Conservation Act Incidental Take Permit Western Joshua Tree Conservation Act Incidental Take Permit (ITP) will be required from the CDFW for the removal of western Joshua trees. The ITP will need to detail all impacts on the species and what alternative relocation plans are proposed. Additionally, the ITP will require mitigation for the loss of individual trees.

BIO-2: Per the San Bernardino County Development Code *Section 88.01.060 Desert Native Plant Protection* the removal of any Joshua trees (eastern and western) would be required to comply with *Section 88.01.050 Native Tree or Plant Removal Permits*. Applicant shall obtain a Tree or Plant Removal Permit prior to the removal of any Joshua trees from the Project Site.

BIO-3: Nesting Birds: Since there is some habitat within the Project site and adjacent area that is suitable for nesting birds in general, the following mitigation measure should be implemented. Nesting bird nesting season generally extends from February 1 through September 15 in southern California and specifically, March 15 through August 31 for migratory passerine birds. To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist will conduct pre-construction Nesting Bird Surveys (NBS) prior to Project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action will be required. If an active nest is found, the biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage, and expected types, intensity, and duration of the disturbance. The nests and buffer zones shall be field-checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

CULTURAL RESOURCES:

CUL-1: If cultural/historical/archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall cease and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983) shall be contacted immediately to evaluate the find(s). If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted and will be reported to the County.

TRIBAL CULTURAL RESOURCES:

Morongo Band of Mission Indians (MBMI) Mitigation Measures

- TCR-1 (MBMI): Native American Treatment Agreement.** Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Agreement with the Morongo Band of Mission Indians for the project. The Tribal Monitor(s) shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources and/or tribal cultural resources.
- TCR-2 (MBMI): Retention of Archaeologist.** Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist will conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.
- TCR-3 (MBMI): Cultural Resource Management Plan.** Prior to any ground-disturbing activities the project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the Consulting Tribe[s] and at minimum, shall include the following: (1) the approved Mitigation Measures (MM)/Conditions of Approval (COA), (2) procedures for each MM/COA, (3) the contact information for all pertinent parties, (4) parties' responsibilities, and (5) an overview of the project schedule.
- TCR-4 (MBMI): Pre-Grade Meeting.** The retained qualified archeologist and Consulting Tribe[s] representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.
- TCR-5 (MBMI): On-site Monitoring.** During all ground-disturbing activities the qualified archaeologist and the Tribal Monitor(s) shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Tribal Monitor(s), shall be responsible for determining the duration and frequency of monitoring.

TCR-6 (MBMI): Inadvertent Discovery of Cultural Resources. In the event that previously unidentified cultural resources are discovered /unearthed during construction, the qualified archaeologist and the Tribal Monitor(s) shall have the authority to temporarily divert and/or temporarily halt ground-disturbance activities in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored ground-disturbing activity can proceed.

If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find(s), so that it/they can be evaluated by the qualified archaeologist and Tribal Monitor[s]. The archaeologist shall notify the Lead Agency and Consulting Tribe[s] of said discovery. The qualified archaeologist, in consultation with the Lead Agency, the Consulting Tribe[s], and the Tribal monitor, shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the qualified archaeologist in consultation with the Tribe[s] and the Tribal monitor[s] and be submitted to the Lead Agency for review and approval.

Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance.
- B. If avoidance is not feasible, Preservation in place.

If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.

- C. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (36 CFR 79).

Unless otherwise agreed upon by all parties, all removed items from the Project shall be temporarily curated on-site in a secure and locked location (i.e., Conex box, a lockable office or drawer with restricted access to it, etc.). A periodic inventory must be maintained and provided to Consulting Tribe[s].

TCR-7 (MBMI): Inadvertent Discovery of Human Remains. The Morongo Band of Mission Indians requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. ***No photographs are to be taken except by the coroner, with written approval by the Consulting Tribe[s].***

- A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected by the establishment of an ESA with a marked boundary. Project personnel/observers will be restricted from entry into the ESA. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination

pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.

- B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
- C. The NAHC shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98
- D. If the Morongo Band of Mission Indians has been named the MLD or Co-MLD, the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's MLD, the landowner, and the City Planning Department.

TCR-8 (MBMI): FINAL REPORT. The final report[s] created as a part of the project (CRMP/AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe[s] for review and comment. After approval of all parties, the final reports are to be submitted to the appropriate Information Center (IC), and the Consulting Tribe[s].

Yuhaaviatam of San Manuel Nation (YSMN) Mitigation Measures

TCR 9 (YSMN): Monitoring and Treatment Plan. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR 10 (YSMN): Archaeological Monitoring. Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

TCR 11 (YSMN): Worker Environmental Awareness Program. Prior to project initiation, a qualified archaeologist should be retained to conduct a Worker's Environmental

Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training should be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Tribal representatives from the Consulting Tribes, such as Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians) will be allowed to attend and/or participate in the WEAP training should they elect to and will be given ten days' notice prior to the training. Archaeological sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

TCR-12 (YSMN): Tribal Monitoring. Due to the heightened cultural sensitivity of the proposed project area, at the discretion of the consulting tribe(s), Tribal monitor(s) authorized to represent YSMN shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). At the discretion of the consulting tribes, a sufficient number of Tribal monitors shall be present each workday to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. Any YSMN Tribal Monitors who access the site shall obtain or possess: (1) security clearance from General Atomics (Tribal Monitor is required to provide either a passport or original birth certificate with accompanying government issued picture ID), (2) Certificate of liability workers compensation and general liability insurance per provided template, with property owner and contractor named as additionally insured, (3) OSHA 30 training certificate, (4) Cal OSHA training certificate, (5) Red cross CPR certificate, (6) professional protective equipment, and (7) Tribal certification/verification. Any Tribal Monitors shall be required to schedule an appointment everyday they monitor the site. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist, as detailed within TCR-9, and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN). Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR-13 (YSMN): Treatment of Cultural Resources During Project Implementation. If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.

The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal

monitor representing the Tribe, unless otherwise decided by YSMN. All plans for analysis shall be reviewed and approved by the applicant and YSMN prior to implementation, and all removed material shall be temporarily curated on-site.

It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process/location and shall include measures and provisions to protect the reburial area from any future impacts.

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and YSMN for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency and YSMN.

TCR-14 (YSMN): Inadvertent Discoveries of Human Remains. If human remains are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

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