LAND USE SERVICES DEPARTMENT
PLANNING COMMISSION STAFF REPORT

HEARING DATE: November 5, 2026 **AGENDA ITEM 3**

Project Description

Project No:	PROJ-2022-00191
APNs:	0594-391-06, -07, and -08
Applicant:	David Corso, Pioneertown Land Company, LLC
Community:	Pioneertown
Location:	53585 Mane Street
County Supervisor:	Dawn Rowe, 3rd District
Staff:	Luis Rodriguez, Contract Planner
Rep:	David Mylnarsky, Transtech
Proposal:	A Conditional Use Permit to renovate an existing 6,223 sq. ft. building to operate a private meeting facility for hospitality events; Interior remodel and refurbish an existing 831 sq. ft. building to operate a coffee and ice cream shop; Construct a 3,024 sq. ft. public shade pavilion with picnic tables, together with accessory and ancillary modular structures to serve as public restrooms, mobile snack cart/kiosk, and a self-contained mobile kitchen on a 1.84 acre site.

Vicinity Map



65 Hearing Notices Sent on: October 13, 2026

SITE INFORMATION:

Project Size: 1.84 Acres
Terrain: Predominately flat.
Vegetation: Existing native vegetation to remain within setbacks, including Joshua Trees

TABLE 1 – SITE AND SURROUNDING LAND USES AND ZONING:

AREA	EXISTING LAND USE	LAND USE CATEGORY	ZONING DISTRICT
SITE	Soundstage/Gazette Building (Commercial)	Commercial (C)	SD-RES (Special Development-Residential)
North	Retail/Camping/Parking	Commercial (C)	SD-RES (Special Development-Residential)
South	Vacant	RL (Rural Living 1 du/2.5 ac max)	SD-RES (Special Development-Residential)
East	Vacant Commercial Building	Commercial (C)	SD-RES (Special Development-Residential)
West	Commercial Pavilion Buildings for Red Dog Saloon	Commercial (C)	SD-RES (Special Development-Residential)

	Agency	Comment
City Sphere of Influence:	N/A	N/A
Water Service:	San Bernardino County SD-70-W4	No comments received
Sewer Service:	On-Site Septic System	SB County EHS

STAFF RECOMMENDS: That the Planning Commission **ADOPT** the Mitigated Negative Declaration, **ADOPT** the Findings for approval of the Conditional Use Permit, **APPROVE** the Conditional Use Permit, subject to the Conditions of Approval, and **DIRECT** staff to file the Notice of Determination.

[1] In accordance with Section 86.08.010 of the Development Code, the Planning Commission action may be appealed to the Board of Supervisors.

Figure 1 - Regional Map

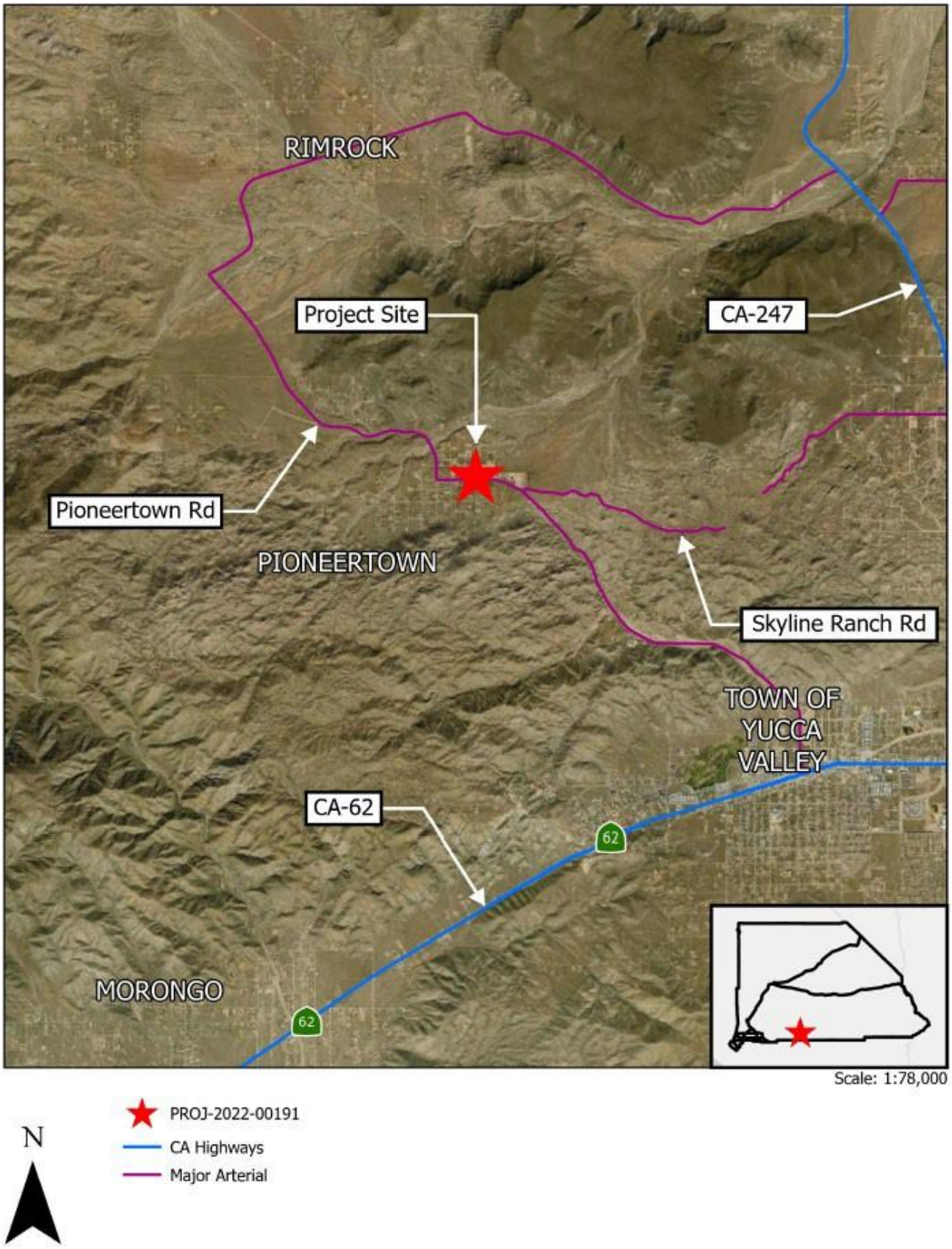


Figure 2 - Aerial Vicinity Map



Figure 3 – Zoomed Aerial Map

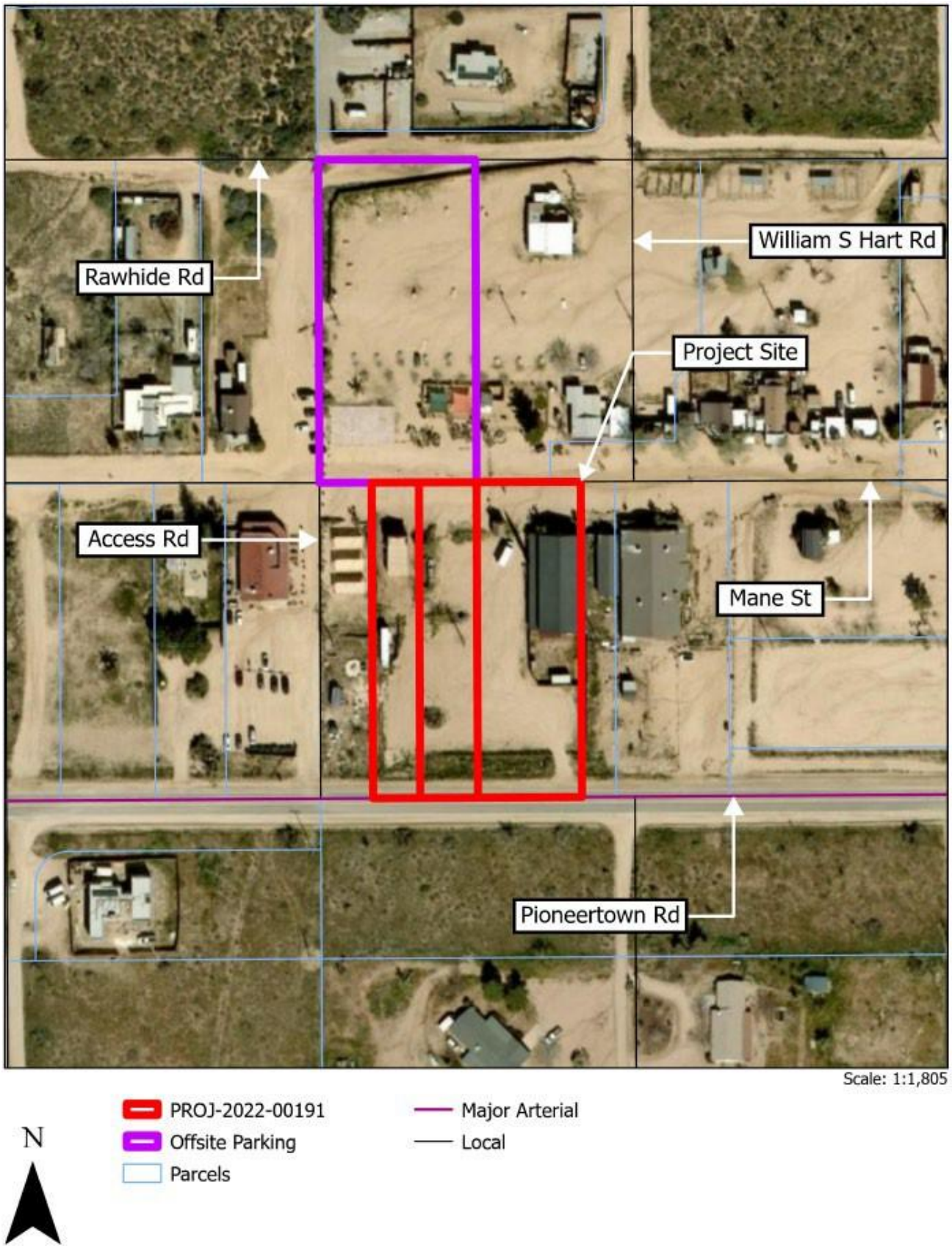


Figure 4 - Land Use Category Map

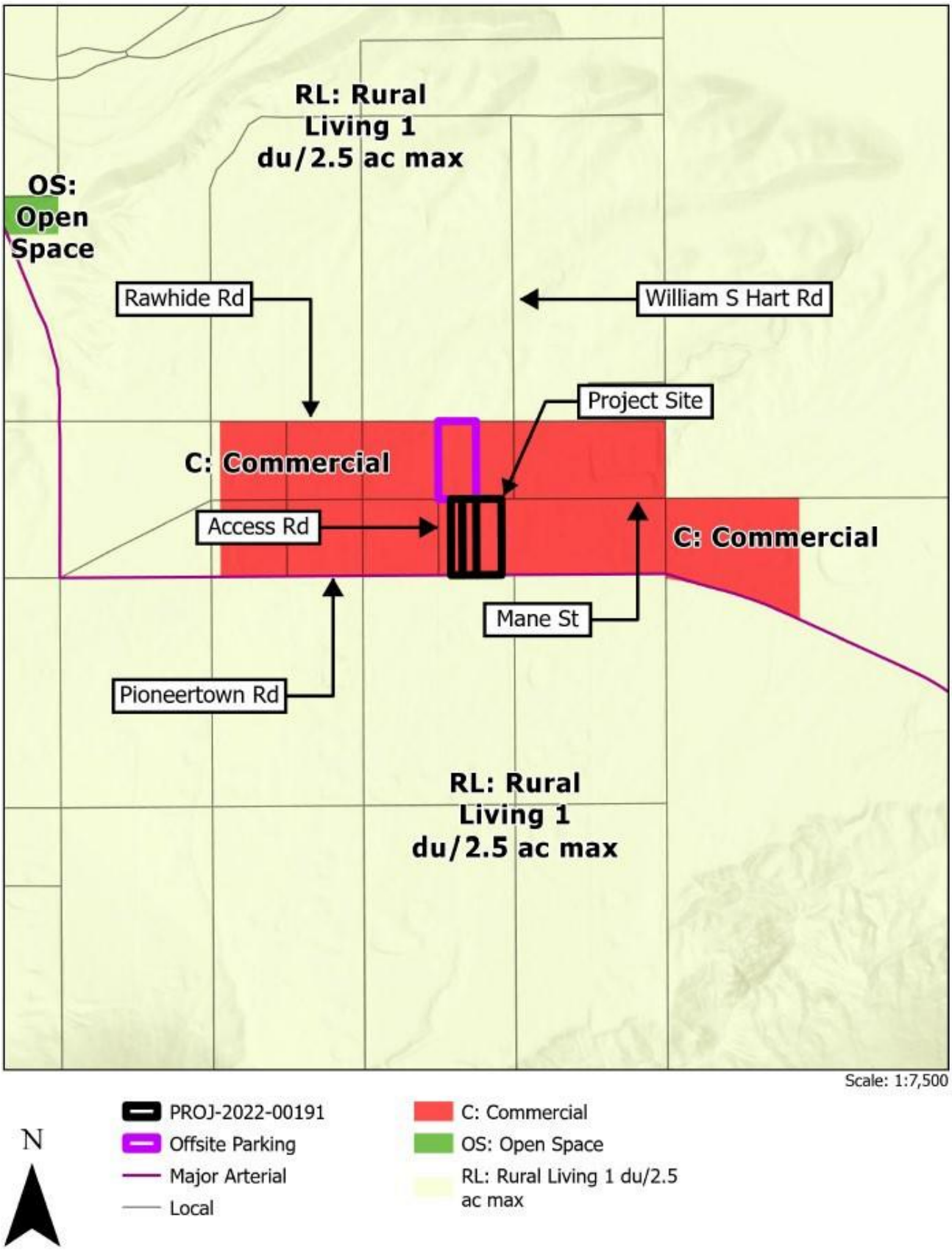
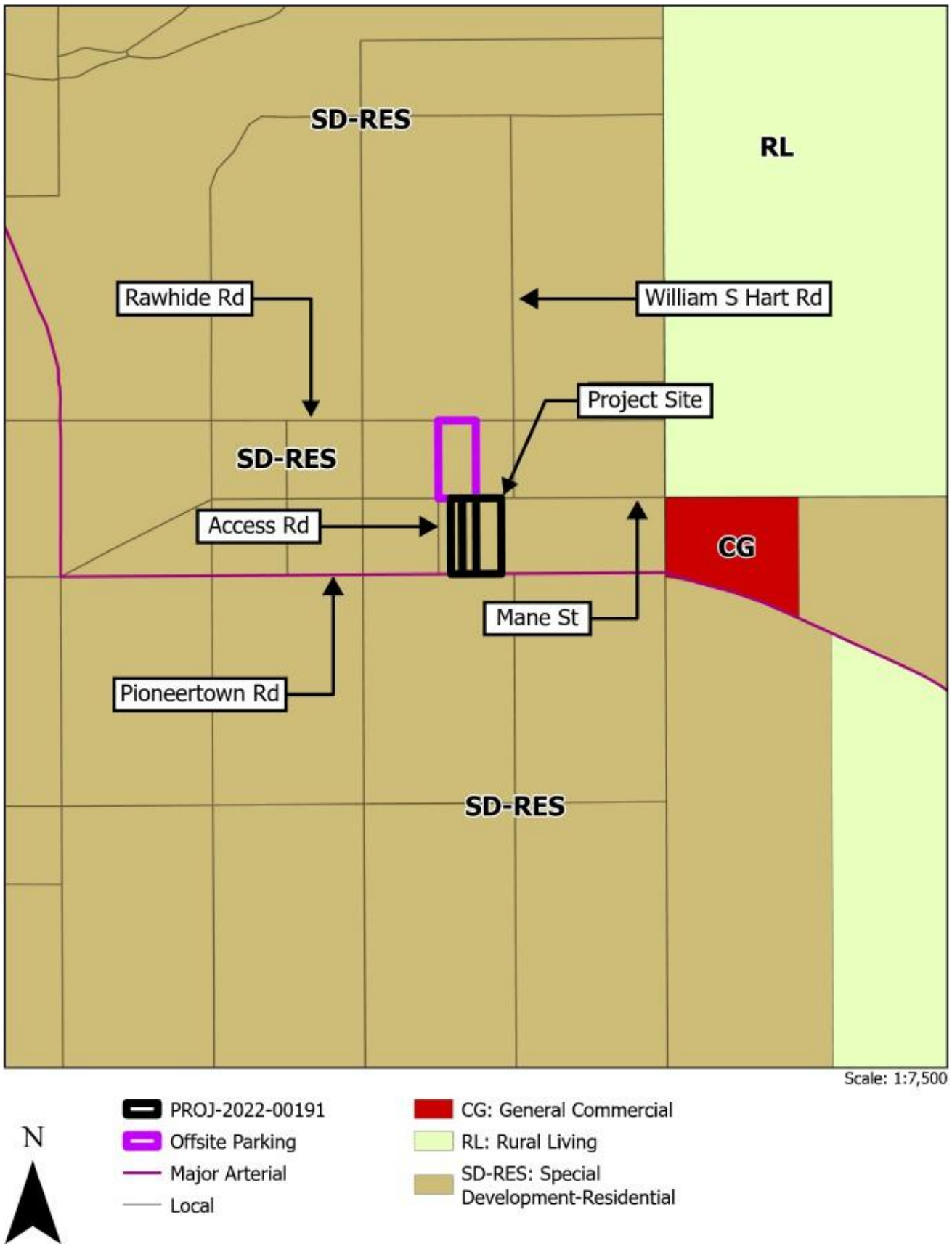
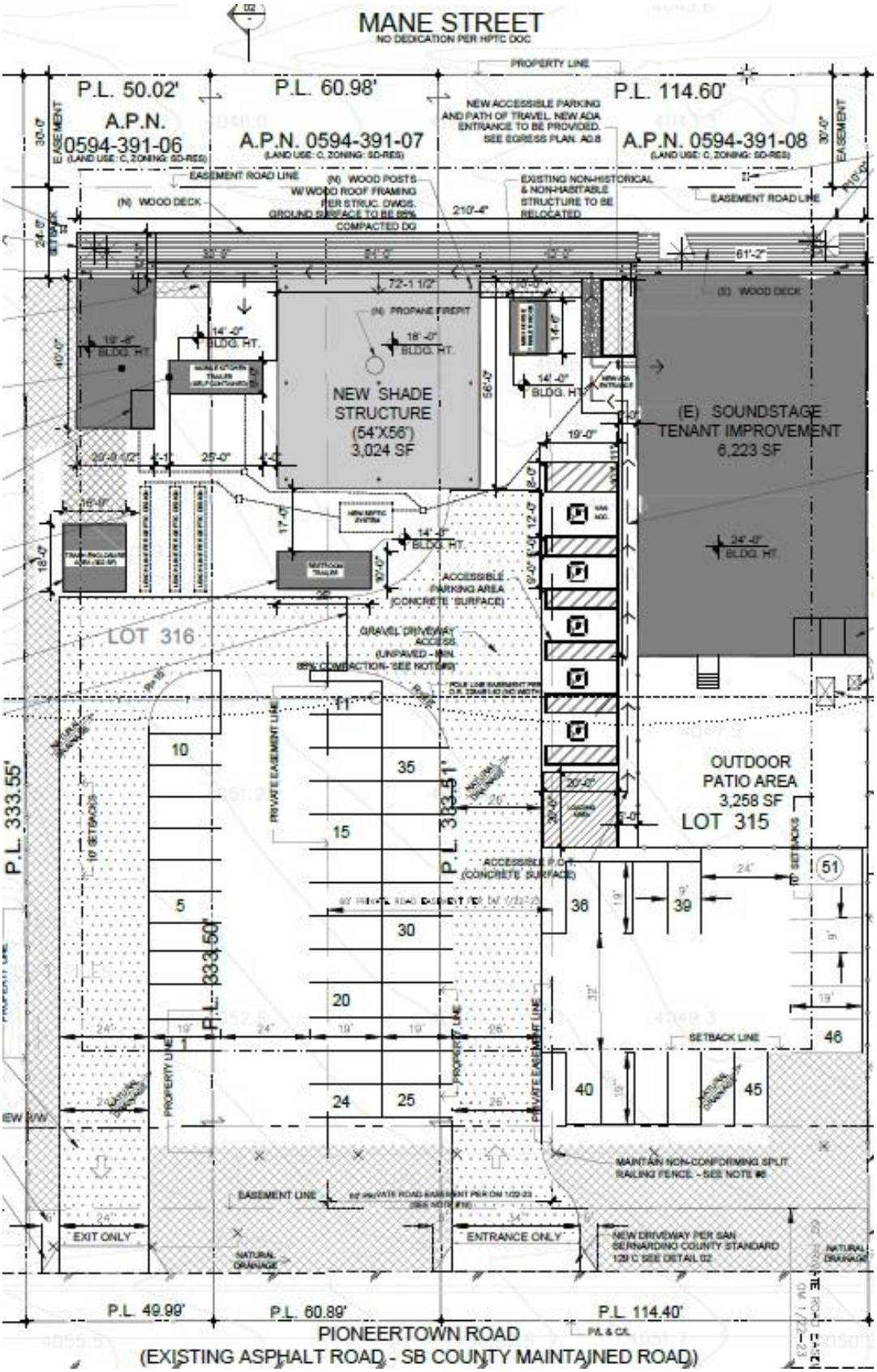


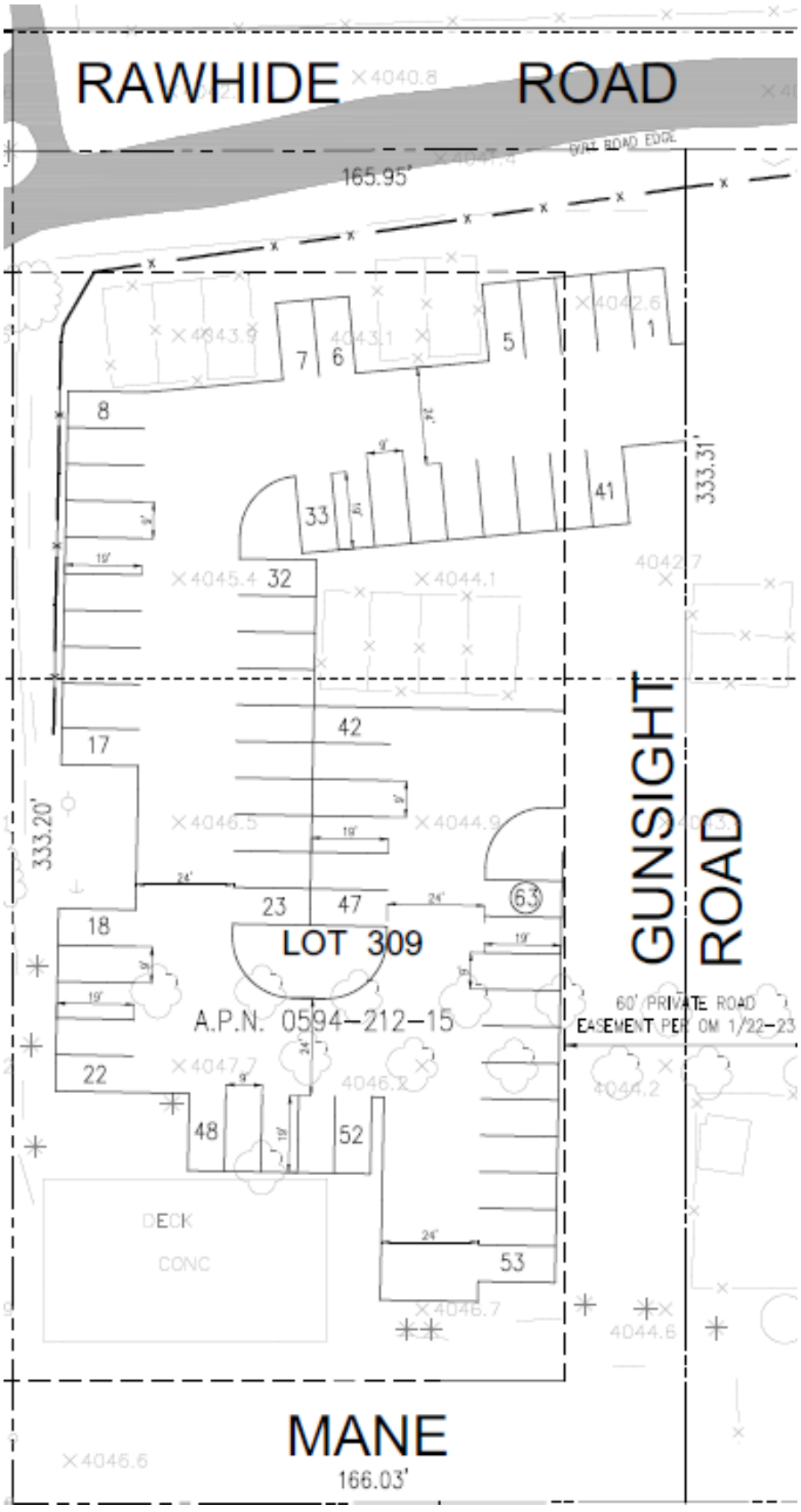
Figure 5 - Official Zoning District Maps



Figures 6 - Site Plans



Parking Agreement Site Plan:



Figures 7 - Photos of Existing Site Conditions



Photo 1 From the northwest corner of the project site looking south along the western boundary.



Photo 2 From the northwest corner of the project site looking east along the northern boundary.



Photo 3 From the northeast corner of the project site looking west along the northern boundary.



Photo 4 From the northeast corner of the project site looking south along the eastern boundary.



Photo 5 From the southeast corner of the project site looking north along the eastern boundary.



Photo 6 From the southeast corner of the project site looking west along the southern boundary.



Photo 7 From the southwest corner of the project site looking east along the southern boundary.



Photo 8 From the southwest corner of the project site looking north along the western boundary.

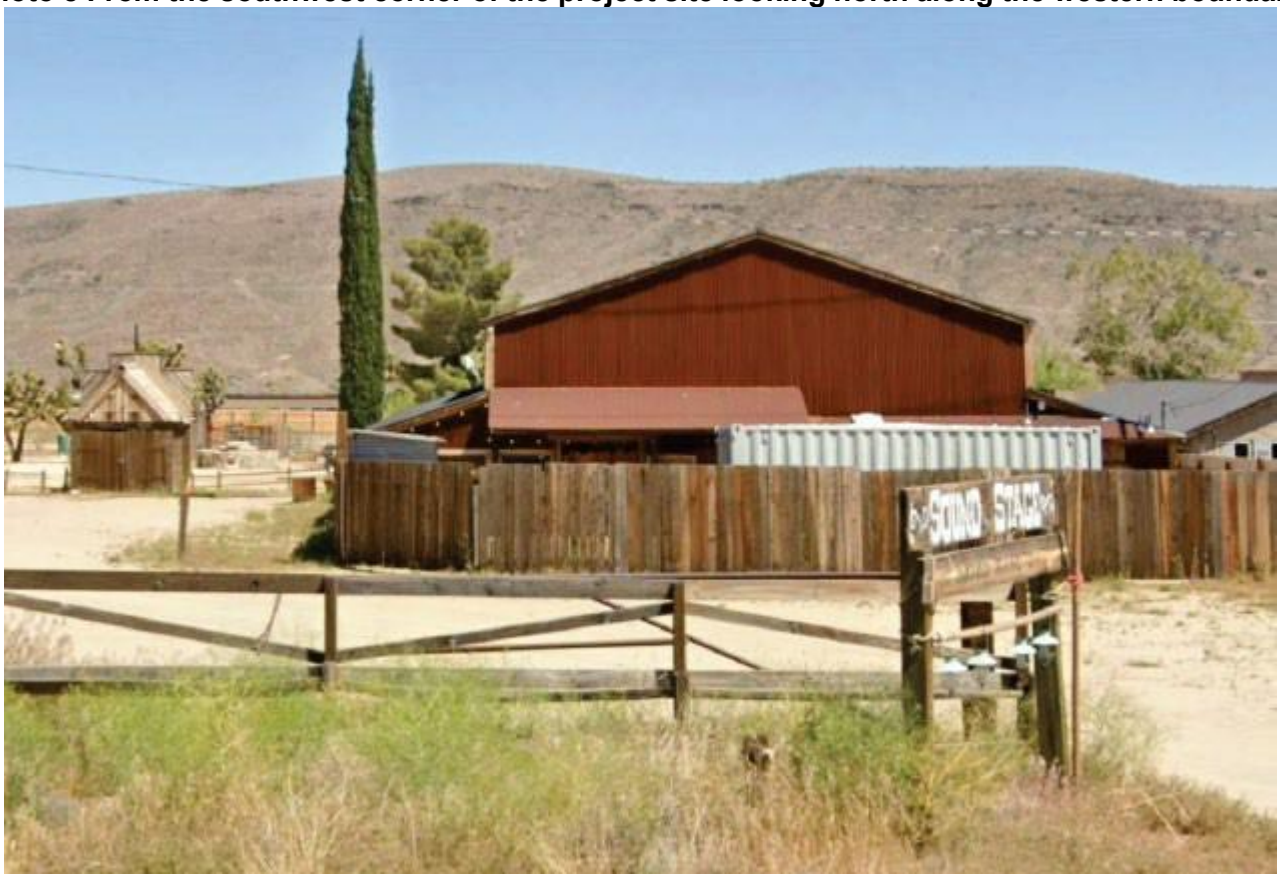


Photo 9 From the southern boundary of the project site looking north at the entrance sign.

PROJECT DESCRIPTION:

The applicant, Pioneertown Land Company, LLC, is requesting approval of a Conditional Use Permit to include the following: renovate an existing 6,223 sq. ft. event building and operate a private meeting facility for hospitality events including wedding ceremonies, receptions, community meetings, and facilitate musical programming for residents and visitors of Pioneertown; interior remodel and refurbish an existing 831 sq. ft. vacant commercial building to establish and operate a coffee and ice cream shop; construct a 3,024 sq. ft. public shade pavilion with picnic tables that will serve as a respite site for all Pioneertown pedestrians, together with accessory and ancillary modular structures to serve as public restrooms in partnership with the County, mobile snack cart/kiosk (125 sq. ft.), and a self-contained mobile kitchen (225 sq. ft.)(collectively the Project). The Project site is within the Pioneertown Community, located at 53585 Mane Street, within the County of San Bernardino; 3rd Supervisorial District. The Project site is comprised of three parcels, APNs: 0594-391-06, -07, and -08, for a combined total of 1.84 acres (Figures 2 and 3). The Project site has a land use category of Commercial (C) and a zoning classification of Special Development-Residential (SD-RES) (Figures 4 and 5).

CONSTRUCTION COMPONENTS (Exhibits A1):

- Renovation of Existing Sound Stage Event Barn (6,223 sq. ft.)
- Renovation of Existing Gazette Building for Coffee and Ice Cream Shop (831 sq. ft.)
- New Outdoor Shade Structure for Pioneertown visitors (3,024 sq. ft.)
- New Mobile Kitchen (225 sq. ft.)
- New Mobile Vendor Kiosk (145 sq. ft.)
- Future Public Portable Bathrooms (250 sq. ft.) – To be installed by SBCO as a capital improvement project.
- New Trash Enclosure (302 sq. ft.)
- New Septic System and Disposal Field
- New Parking Layout with 57 On-Site Parking Spaces
- Grading & Stormwater Improvements
- Road Improvements (ROW dedication and driveways on Pioneertown Road)

PROJECT ANALYSIS:

Existing Site Conditions: The Project site consists of three parcels with two historic contributing structures in the Pioneertown Historic District that front Mane Street and are recognized in the National Register of Historic Places. The northern portion of the site fronting Mane Street is currently developed with an operating event venue named “The Sound Stage” (barn structure formerly the “Silver Dollar” as documented in the historic survey registration form), a vacant commercial building (former Pioneertown Gazette), and a small accessory non-contributing building. To the rear and southern portion is an unpaved parking lot encompassing portions of the three parcels. The southern portion fronting Pioneertown Road contains some native vegetation along the road berm (drainage control) and wood “corral” fencing.

Abutting the north property line is Mane Street, a non-vehicular/pedestrian only street due to its historic designation. The street characteristics are of a “western town” type street that is maintained in an unpaved condition for pedestrian and equine use, as well as special event gatherings. There are retail establishments across Mane Street. Other surrounding land uses include a seating pavilion to the west associated with the Red Dog Saloon across Tom Mix Road,

a retail business and bowling alley to the east (all contributing structures), and a vacant parcel across Pioneertown Road to the south and beyond that, a single-family house.

Site Planning: The subject property is in the Pioneertown Community Planning Area with a Land Use Zoning District designation of Special Development-Residential (SD-RES). One of the purposes of the SD-RES zone identified in the Development Code is to provide for a mix of residential, commercial, industrial, agricultural, open space, and recreation uses. Pursuant to Section 82.06.040, Table 82-17, a private meeting facility and coffee shop, are all allowed in the SD-RES zone with a Conditional Use Permit (CUP). Accessory structures are allowed with a Site Plan Permit. Therefore, the development of the proposed meeting facility renovation, commercial building renovation for a coffee shop, new accessory shade structure pavilion, and the ancillary uses described in the Construction Components section above, are allowed and subject to the approval of the CUP and conditions of approval (Exhibit C).

The Board of Supervisors approved the exploration by the Department of Public Works of the installation of public restrooms in the Pioneertown business district. To assist in this public benefit effort, the applicant has included a potential location of a public restroom on the site plan. The responsibility of on-going maintenance of the public restroom has yet to be determined.

Access to the Project site is provided along Pioneertown Road on the southeast entrance to the site (see Exhibit A1). Vehicle circulation through the site is configured in a horseshoe pattern with two points of access on Pioneertown Road.

The Project Site Plan provides an adequate area to accommodate all buildings, access, circulation requirements, and most of the required parking needed to comply with County requirements (See Table 2 below). The Project requires 120 parking spaces, of which 57 are provided on site. Development Code Section 83.11.030(a) authorizes required parking to be located away from the Project site or contiguous premises where the off-site parking is located in conformity with a Site Plan approved in compliance with Chapter 85.08. Chapter 85.08 further authorizes a Site Plan Permit for the provision of additional parking required by Chapter 83.11. Accordingly, the remaining 63 required parking spaces required shall be provided off site in an established parking lot within Pioneertown through the approval of a Site Plan Permit. In addition, consistent with Section 83.11.030(e), the applicant will be required to demonstrate that the off-site parking spaces will remain permanently available and maintained for the Project, including through a parking agreement. The condition of approval will require a site plan demonstrating the capacity for 63 parking spaces. Currently, the applicant has ownership of a parcel across Mane Street with an established parking area that can accommodate the required 63 parking spaces. The offsite parking plan is shown as Exhibit A-2 and the Project has been conditioned to require approval of the Site Plan Permit and an appropriate parking agreement prior to occupancy (Exhibit C).

The Project has been conditioned by the Planning Division, Land Development Division, Building and Safety Division, Department of Environmental Health Services, Fire Department, and Department of Public Works' Traffic Division.

Table 2 below identifies the existing buildings and sizes with respective required/allocated parking spaces with the proposed buildings:

PARKING LOAD BREAKDOWN				
STRUCTURE / USE	SQUARE FOOTAGE	PARKING RATIO	SPACES REQUIRED	SPACES PROVIDED
SOUNDSTAGE (STANDING AREA)	1,575 SQ.FT.	1 space.2.5 guests 300 occupancy limit	94	46
SOUNDSTAGE (FIXED SEATING: 67 SEATS)	6,223 SQ.FT.	1 PER 3 SEATS	22	1
COFFEE SHOP (RETAIL / TRADE: 12 SEATS)	831 SQ.FT.	1 PER 3 SEATS	4	4
MOBILE KITCHEN TRAILER (RETAIL / TRADE)	225 SQ.FT.	N/A	-	-
PUBLIC OUTDOOR DINING AREA (RETAIL / TRADE)	3,024 SQ.FT.	N/A	-	-
KIOSK TRAILER (RETAIL / TRADE)	145 SQ.FT.	N/A	-	-
RESTROOM TRAILER (RETAIL / TRADE)	250 SQ.FT.	N/A	-	-
	TOTAL REQUIRED SPACES		120*	51

PARKING BREAKDOWN:

STANDARD SPACES

120 REQ. ..... 51 PROVIDED

ACCESSIBLE SPACES

2 REQ. ..... 5 PROVIDED (4 STANDARD ADA + 1 VAN ADA)

LOADING SPACES

1 REQ. ..... 1 PROVIDED

TOTAL
57 ON SITE

* 63 additional off-site parking spaces will be provided through a Site Plan Permit and parking agreement across the street north of Mane Street on APN: 0594-212-15.

For any event, the applicant has imposed a maximum occupancy for the Sound Stage building at no more than 300 people.

According to the primary professional publications and industry standards used to determine vehicle occupancy rates and traffic impact for special events or wedding venues as published by the Institute of Transportation Engineers (ITE), general standard per-vehicle occupancy for wedding guests visiting in personal cars is 2 to 2.5 guests per vehicle. The parking load breakdown reflects a parking formula to accommodate an additional 94 parking spaces at a rate of 2.5 guests per vehicle. With the existing fixed seats parking of 22 spaces and the Gazettes 4 required parking spaces, the Project will provide the required 120 parking spaces.

Table 3:

PROJECT DEVELOPMENT CODE COMPLIANCE

Project Component	**Special Development-Residential (SD-RES)**		**Project Plans**
Parking	120 spaces per occupancy rate with 5 ADA accessible and 1 loading parking spaces (see Table 2 Parking Load Breakdown)		Project Specific Parking: 57 spaces with 5 ADA accessible parking spaces, a loading parking space, and 63 spaces off-site with Site Plan Permit and parking agreement.
Landscaping	Minimum Landscaping	20%	23%*
Building Setbacks	Front Street Side Interior Side Rear	25’ 25’ 10’ 10’ (25’ for double frontage)	25’ N/A N/A 200+’
Building Height	35 feet maximum		18’-6” (for new)

Maximum Lot Coverage	80%	16%
Drive Aisles	26’	26’

***** The Desert Region excludes the parking area from the landscape requirements. The 23% landscape coverage area reflects the net development area.

** The existing historical contributing buildings (Soundstage and Gazette) observe an existing 26’-3” front yard setback. The Soundstage building also observes a 0-foot setback on the east property line as this is where the building was constructed in 1947. The front of the new outdoor pavilion will match the same building line as the existing structures.

Code Compliance Summary: As noted above, the Project satisfies all applicable standards of the Development Code Section 82.06.060 for development within the SD-RES Zone, as illustrated in Tables 2 and 3.

Historic Architectural Content: On May 29, 2020, the Office of Historic Preservation placed the Mane Street District on the list with the Department of the Interior as a National Register Historic District. New buildings are proposed to be consistent with the objectives articulated in the Pioneertown Communities Action Guide contained in the Countywide Plan’s Policy Plan. In keeping with the historic western themed movie set, the new pavilion building will respect the scale and 19th Century Western vernacular character of Pioneertown. The outdoor pavilion building materials will be consistent with other buildings along Mane Street and primarily be of wood, decorative elements, wood boardwalks, and hand-painted signage will also be included. Furthermore, the exterior work that has occurred on the exterior of the Pioneertown Gazette building has been an attempt to restore the replica building by removing the vinyl framed windows and faux siding (T1-11 plywood) and replace with wood framed windows and wood 6” siding. The new pavilion shade structure will be 18’5.5” tall, which is less than the Gazette Building which stands 19’8” and the sound stage which stands almost 25 feet in height.

Landscaping: Landscaping is provided through a combination of existing native vegetation and the six (6) existing Western Joshua Trees, as described in the biological report reference in the circulated initial study. These trees are to be protected in place if possible. However, the one (1) Joshua Tree that was in front of the Pioneertown Gazette building will be temporarily relocated until the exterior work is completed. Upon the completion of the boardwalk, the tree is to be replanted in front of the subject building with the help of an arborist as stipulated per State law, Development Code Section 88.01.050, and the conditions of approval (Exhibit C).

The proposed Project meets the 20% minimum landscape area for consistency with the Development Standards. The existing landscape percentage as detailed in Table 3-Project Code Compliance 23%. To maintain the historic settings as detailed and described in the National Register of Historic Places Registration for the Mane Street Historic District, the landscaping shall adhere to the native drought tolerant plant selections native to Pioneertown and Yucca Valley. Other than augmenting the native landscaping utilizing xeriscaping techniques and improved access points on Pioneertown Road, most of the existing landscaping will remain in place.

Fencing: Other than repairs and any modification to the driveway entrances, existing fencing along Pioneertown Road as depicted below is to remain:



Proposed Hours of Operation:

Pioneertown Sound Stage

Monday	11am to 3pm for lunch then 6pm to 10pm for dinner or events
Tuesday	Closed
Wednesday	Closed
Thursday	11am to 3pm for lunch then 6pm to 10pm for dinner or events
Friday	11am to 2am
Saturday	11am to 2am
Sunday	11am to 3pm for lunch then 6pm to 10pm for dinner or events

Per the applicant's Letter of Intent, the following programming would occur during the requested business hours:

- *Musical programming for residents and visitors to Pioneertown such as Cowboy Karaoke, Line dancing, and Country Rock performances but also more varied programming like vinyl listening sessions and current popular music options.*
- *Community resource to accommodate fundraisers for local organizations such as the SB County Sheriff's department and CHP Holiday Party, Joshua Tree National Park Association, and local residential uses such as Pioneertown Holiday Potluck and various celebration of life events for residents.*

- *Continue the history of the Sound Stage, being a venue to rent for weddings and events on off nights when there isn't scheduled programming.*
- *Except for special events and bookings, catering for lunch and dinner will be provided by local restaurants.*

Pioneertown Gazette (Coffee Shop & Ice Cream Parlor)
Monday, Thursday - Sunday 7am to 3pm for breakfast and lunch
Tuesday, Wednesday Closed

Mobile Kitchen, Kiosk, and Shade Pavilion
Monday – Sunday – 7 a.m. – 10 p.m.

California Environmental Quality Act Compliance:

An Initial Study (IS) has been completed in compliance with the California Environmental Quality Act (CEQA) (Exhibit D). The IS concludes that the Project will have a less than significant adverse impact on the environment with the implementation of recommended mitigation measures for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, and Tribal Cultural Resources, which have been incorporated within the Mitigation Monitoring & Reporting Program (MMRP) (Exhibit E). A Notice of Availability/Notice of Intent (NOA/NOI) to adopt a Mitigated Negative Declaration (MND) was advertised and distributed to initiate a 30-day public comment period, which concluded on March 16, 2026. Fourteen (14) comment letters to the NOA/NOI were received via emails from neighbors, an organization (Morongo Basin Conservation Association), and responsible state agencies requesting consideration of comments (Exhibit G1). A Response to Comments addressing the following topics are attached as Exhibit H:

- Land Use Compatibility and Impact on Residential Uses:
- Historic Preservation
- Scenic Route
- ISMND's Transportation Screening Assessment and Vehicular Miles Travelled (VMT)
- Parking and Occupancy
- Noise and Hours of Operation (DJ music, amplified sound)
- Water Usage and Wastewater
- Storm Water
- Light Pollution
- Fugitive Dust
- Joshua Trees
- Solid Waste Management
- Public Safety and Infrastructure Resources (fire, police, utilities, etc.)

Subsequently, an Errata to the IS/MND was prepared and attached at the end of Exhibit G to address minor corrections and supplemental information identified during the environmental review process. The Errata clarifies the number of full- and part-time employees stated in the NOC and confirms that the corrected employee information does not change the conclusions of the Air Quality and Greenhouse-Gas Impact Assessment. The Errata also clarifies Project square footage identified in the NOC and the Biological Resources Assessment (BRA). The NOC's

reference to 12,449 square feet included impervious area associated with the ADA parking, while the BRA mistakenly described the event and community gathering space and hospitality Project as consisting of 10,377 square feet. The BRA has been revised to correct and simplify that description and is included as an attachment to the Responses to Comments. These corrections do not alter the Project analyzed in the IS/MND or its technical studies, and do not change any environmental impact or significance conclusion. Accordingly, recirculation is not required under CEQA Guidelines section 15073.5 because the corrections and supplemental information do not identify a new, avoidable significant environmental effect or substantially increase the severity of an identified impact, and do not constitute a substantial revision of the IS/MND. Rather, the Errata corrects and clarifies information regarding the Project as already analyzed, without changing the IS/MND's impact determinations or conclusions.

The following are summaries of the biological and cultural topics addressed in the IS/MND with additional topics and mitigation measures fully detailed in the MMRP (Exhibit D):

Biological: With incorporation of mitigation measures, impacts to biological resources would be less than significant. Mitigation Measures BIO-1 through BIO-3 require protection of western Joshua trees within and adjacent to construction areas, including protective fencing, restrictions on construction activities within tree protection areas, and compliance with applicable CDFW permitting requirements if any Joshua tree take occurs. Mitigation Measure BIO-4 requires a pre-construction nesting bird survey and, if active nests are identified, appropriate avoidance buffers and monitoring. Accordingly, potential direct and indirect impacts to candidate, sensitive, or special-status species would be reduced to less than significant levels.

Cultural and Tribal Cultural Resources:

No archaeological resources were identified within the Project site, and the Native American Heritage Commission Sacred Lands File search was negative. Also, the County, acting as the Lead Agency under CEQA, commenced the AB 52 process by transmitting letters of notification to the California Native American tribes traditionally and culturally affiliated with the Project area on December 6, 2023, to offer an opportunity for the designated tribes to consult with the County on the proposed Project. The Twenty-Nine Palms Band of Mission Indians responded that after reviewing the proposed project, it was determined that the project is outside of the known Chemehuevi Traditional Use Area.

However, Mitigation Measure CUL-2 requires earthmoving or grading to cease in the immediate area if cultural resources are encountered during construction and requires evaluation by a qualified archaeologist. With implementation of CUL-2, potential impacts to archaeological and tribal cultural resources would be less than significant.

PUBLIC COMMENTS:

On February 13, 2026, project notices were sent to surrounding property owners within 300 feet of the Project site, as required by Development Code Section 85.03.080. There were twelve (12) responses to Project Notice; five (5) letters were in opposition, and seven (7) letters were in support.

On October 13, 2026, the Planning Division sent out the Notice of Hearing (NOH) to twenty-two (22) recipients within the required 300-foot radius and all listed interested parties for the public hearing on November 5, 2026.

RECOMMENDATIONS: That Planning Commission:

1) **ADOPT** the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.

2) **ADOPT** the Findings in support of the Conditional Use Permit.

3) **APPROVE** the Conditional Use Permit to renovate an existing 6,223 sq. ft. building to operate a private meeting facility for hospitality events; interior remodel and refurbish an existing 831 sq. ft. building to operate a coffee and ice cream shop; and construct a 3,024 sq. ft. public shade pavilion with picnic tables, together with accessory and ancillary modular structures to serve as public restrooms, mobile snack cart/kiosk, and a self-contained mobile kitchen as shown on the approved site plan on an approximate 1.84 acre site, subject to the Conditions of Approval.

4) **DIRECT** the Land Use Services Department to file a Notice of Determination in accordance with the California Environmental Quality Act.

ATTACHMENTS:
EXHIBIT A1: Site Plan and Elevations
EXHIBIT A2: Parking Agreement Lot Site Plan
EXHIBIT B: Findings
EXHIBIT C: Conditions of Approval
EXHIBIT D: Initial Study/Mitigated Negative Declaration
EXHIBIT E: Mitigation Monitoring & Reporting Program
EXHIBIT F: Comment Letters and Responses to CEQA 30-Day Public Review with Errata

EXHIBIT A-1

VICINITY MAP:



OFFICIAL USE ONLY:

LANDSCAPE CALCULATIONS:

THE UNPAVED PARKING LOT AREA: 26,720 SQ. FT.; RESULTING IN A MINIMUM LANDSCAPE AREA OF APPROXIMATELY 7,057 SQ. FT (35,285.25 SQ. FT. X 20%).

TOTAL LANDSCAPE AREA PROPOSED: 9,095 SQ. FT.

NATIVE, DROUGHT TOLERANT / XERISCAPE LANDSCAPED AREA

NOTES

1. SEE CIVIL DRAWINGS FOR DRAINAGE DETAILS
2. PARKING AREAS TO BE EXISTING DIRT / DG
3. OUTDOOR LIGHTING TO COMPLY WITH DESERT LIGHTING ORDINANCE
4. COUNTYWIDE PLAN LAND USE IS C (COMMERCIAL)
5. ZONING DISTRICT IS SD RES (SPECIAL DEVELOPMENT RESIDENTIAL)
6. STREET VACATION TO BE COMPLETED PER PARCEL MAP AND FILED.
7. MAINTAIN NATIVE LANDSCAPE ALONG PIONEERTOWN ROAD
8. IMPROVEMENTS WITHIN RIGHT OF WAY TO OBTAIN ENCROACHMENT PERMIT FROM PUBLIC WORKS
9. IF THE ACCESS ROADS / DRIVEWAYS ARE NOT TO BE PAVED WITH A PERMANENT, ALL-WEATHER SURFACE SUCH AS ASPHALT OR CONCRETE, FIRE DEPARTMENT ACCESS ROAD SHALL COMPLY TO SBCOFD STANDARD A-1, REF: SURFACES. FIRE ACCESS ROADWAYS SHALL BE COMPACTED AND CAPABLE OF VEHICLE SUPPORT UP TO 80,000 LBS. AND ROADS MAY BE CONSTRUCTED WITH NATIVE MATERIALS OR GRAVEL, COMPACTED TO 85% COMPACTION.
10. PRIVATE ROAD EASEMENT WILL BE CONDITIONED TO BE VACATED.

PROJECT TEAM:

OWNER:
PIONEERTOWN LAND COMPANY LLC
CONTACT:
DAVID CORSO
DCORSO@CORSOMG.COM
TEL: 415.734.0686

DESIGNER:
BLU HAUS DESIGN STUDIO LLC
ART MARQUEZ
ART@BLUHAUSDESIGN.COM
TEL: (626) 235-8751

CIVIL ENGINEER:
TRANSTECH
DAVID MLYNARSKI
DAVID.MLYNARSKI@TRANSTECH.ORG

ENGINEER OF RECORD:
TBD

PARKING CALCULATIONS:

PARKING LOAD BREAKDOWN

STRUCTURE / USE	SQUARE FOOTAGE	PARKING RATIO	SPACES REQUIRED	SPACES PROVIDED
SOUNDSTAGE (STANDING AREA)	1,575 SQ.FT.	1 space 2.5 guests 300 occupancy limit	94	46
SOUNDSTAGE (FIXED SEATING: 67 SEATS)	6,223 SQ.FT.	1 PER 3 SEATS	22	1
COFFEE SHOP (RETAIL / TRADE: 12 SEATS)	831 SQ.FT.	1 PER 3 SEATS	4	4
MOBILE KITCHEN TRAILER (RETAIL / TRADE)	225 SQ.FT.	N/A	-	-
PUBLIC OUTDOOR DINING AREA (RETAIL / TRADE)	3,024 SQ.FT.	N/A	-	-
KIOSK TRAILER (RETAIL / TRADE)	145 SQ.FT.	N/A	-	-
RESTROOM TRAILER (RETAIL / TRADE)	250 SQ.FT.	N/A	-	-
	TOTAL STANDARD SPACES		120*	51

PARKING BREAKDOWN:

STANDARD SPACES
120 REQ. ..... 51 PROVIDED

ACCESSIBLE SPACES
2 REQ. ..... 5 PROVIDED (4 STANDARD ADA + 1 VAN ADA)

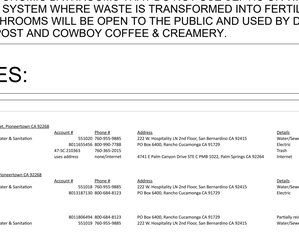
LOADING SPACES
1 REQ. ..... 1 PROVIDED

TOTAL 57 ON SITE

* 63 ADDITIONAL OFF SITE PARKING AVAILABLE NORTH OF MANE STREET ON APN: 0594-212-15 per PARKING LOT AGREEMENT - SEE PARKING AGREEMENT MAP BELOW

SIGNAGE: NO PROPOSED SIGNS

ROAD SECTION (PIONEERTOWN ROAD) (EXISTING) 01



TYPICAL SECTION
WITH CONTINUOUS LEFT TURN LANE

NOTES:
1. STRUCTURAL SECTION OF ROADWAY SHALL BE DETERMINED FROM SOILS TESTS AND SO INDICATED ON CONSTRUCTION PLANS.
2. DRAINAGE FACILITIES SHALL BE PROVIDED TO DEWATER RAISED MEDIAN AREAS.
3. 10' SHOULDER AREAS MAY BE DESIGNATED AS A BIKE LANE AND EMERGENCY PARKING ONLY.

MAJOR HIGHWAY STD. 101

PARKING AGREEMENT MAP 02

PROJECT DESCRIPTION:

DESERT 5 (SOUNDSTAGE)
THIS VENUE NOW KNOWN AS THE SOUNDSTAGE WILL BE USED AS A MULTI-PURPOSE FACILITY FOR COMMUNITY FUNCTIONS, LIVE AND RECORDED MUSIC EVENTS, PRIVATE EVENTS, FOOD & BEVERAGE SERVICE INCLUDING OBTAINING AN ABC LICENSE.

HITCHING POST (COVERED OUTDOOR DINING AREA)
THIS IS A NEW OPEN AIR SHADE STRUCTURE FOR VISITORS AND COMMUNITY TO USE FOR OUTDOOR DINING, MEETINGS, EVENTS.

COWBOY COFFEE & CREAMERY (@ EXISTING GAZETTE)
THE MOST REQUESTED FEATURE ASKED BY VISITORS AND LOCALS, A COFFEE AND ICE CREAM SHOP IN THE OLD PIONEERTOWN GAZETTE.

PIONEERTOWN CAFE (MOBILE KITCHEN TRAILER)
A 30-40' CUSTOM KITCHEN SITUATED BEHIND THE HITCHING POST TO SERVE AS A WALK UP FOOD SERVICE FEATURING HEALTHY SALADS, SANDWICHES AND OTHER FOOD OPTIONS. THIS KITCHEN WILL ALSO SERVE DESERT 5 AND COWBOY COFFEE & CREAMERY.

BATHROOMS (PUBLIC RESTROOM TRAILER)
THESE ERGONOMIC BATHROOMS THAT DO NOT USE SEPTIC OR WATER FEATURE A SYSTEM WHERE WASTE IS TRANSFORMED INTO FERTILIZER. THESE BATHROOMS WILL BE OPEN TO THE PUBLIC AND USED BY DESERT 5, HITCHING POST AND COWBOY COFFEE & CREAMERY.

UTILITIES:

Pioneertown Utilities by Property

Soundstage - 53585 Mane Street, Pioneertown CA 92268

Provider	Account #	Phone #	Address	Details
SB County Special Districts Water & Sanitation	551020	760-955-9885	222 W. Hospitality LN 2nd Floor, San Bernardino CA 92415	Water/Sewer
SoCal Edison	801165456	800-990-7788	PO Box 6400, Rancho Cucamonga CA 91729	Electric
Burrtec	47-SC 210363	760-365-2015		Trash
Flashbyte	uses address	none/internet	4741 E Palm Canyon Drive STE C PMB 1022, Palm Springs CA 92264	Internet

Gazette - 53543 Mane Street, Pioneertown CA 92268

Provider	Account #	Phone #	Address	Details
SB County Special Districts Water & Sanitation	551018	760-955-9885	222 W. Hospitality LN 2nd Floor, San Bernardino CA 92415	Water/Sewer
SoCal Edison	801318730	800-684-8123	PO Box 6400, Rancho Cucamonga CA 91729	Electric

Retail Shops - 53586 Mane St

SoCal Edison	801380494	800-684-8123	PO Box 6400, Rancho Cucamonga CA 91729	Partially reimbursed from Sarah and Daniel
SB County Special Districts Water & Sanitation	551019	760-955-9885	222 W. Hospitality LN 2nd Floor, San Bernardino CA 92415	Water/Sewer

Retail Shops - 53626 Mane St

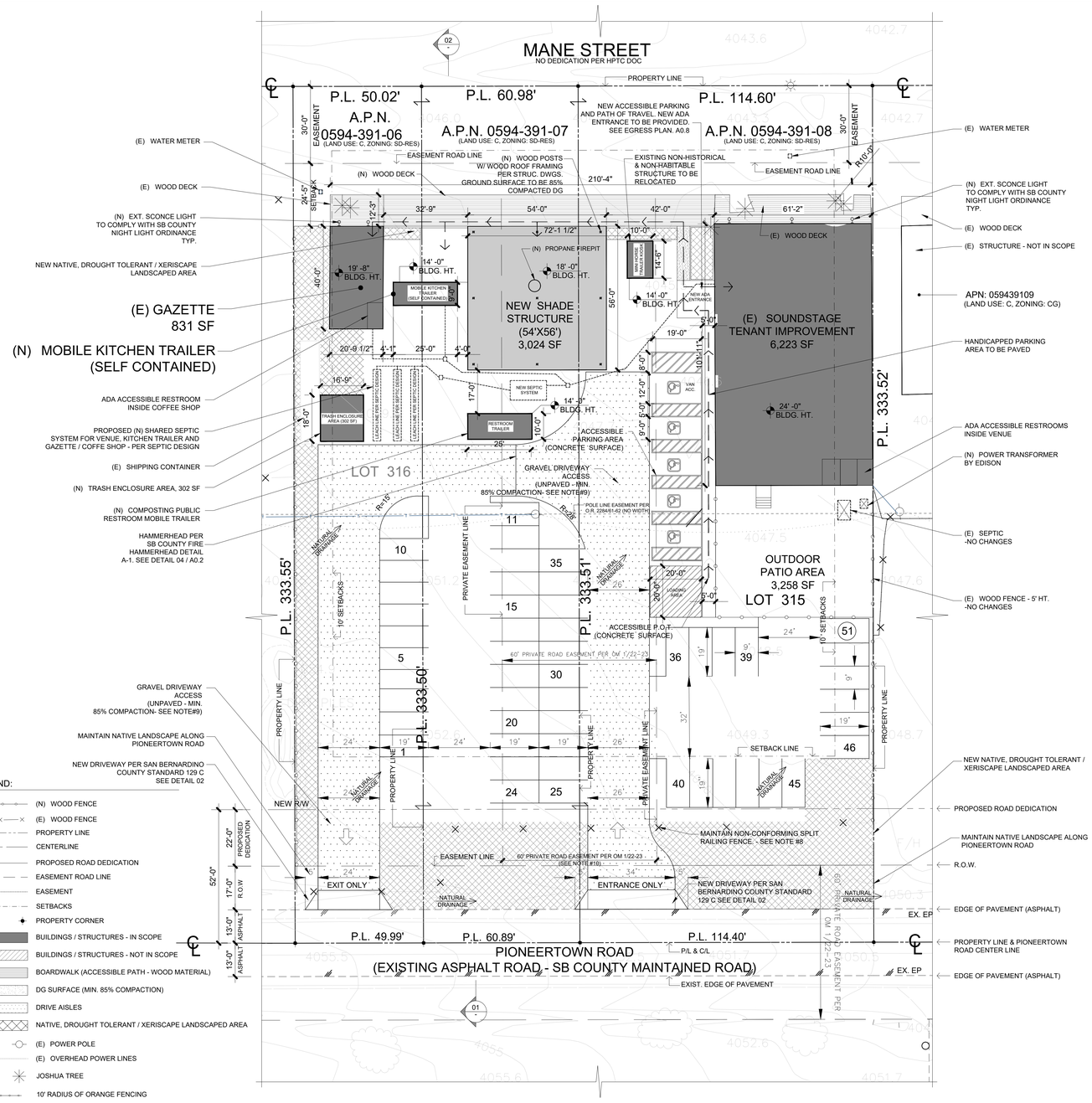
SB County Special Districts Water and Sanitation	551021	760-955-9885	222 W. Hospitality LN 2nd Floor, San Bernardino CA 92415	

Retail Shop - 5099 William S. Hart Rd

SoCal Edison	801483137	800-684-8123	PO Box 6400, Rancho Cucamonga CA 91729	

Camping

SoCal Edison	801090273	800-990-7788	PO Box 6400, Rancho Cucamonga CA 91729	Electric - Street lights
SoCal Edison	801090285	800-990-7788	PO Box 6400, Rancho Cucamonga CA 91729	Electric - Street lights



LEGEND:

- (N) WOOD FENCE
- (E) WOOD FENCE
- PROPERTY LINE
- CENTERLINE
- PROPOSED ROAD DEDICATION
- EASEMENT ROAD LINE
- EASEMENT
- SETBACKS
- PROPERTY CORNER
- BUILDINGS / STRUCTURES - IN SCOPE
- BUILDINGS / STRUCTURES - NOT IN SCOPE
- BOARDWALK (ACCESSIBLE PATH - WOOD MATERIAL)
- DG SURFACE (MIN. 85% COMPACTION)
- DRIVE AISLES
- NATIVE, DROUGHT TOLERANT / XERISCAPE LANDSCAPED AREA
- (E) POWER POLE
- (E) OVERHEAD POWER LINES
- JOSHUA TREE
- 10' RADIUS OF ORANGE FENCING
- LOT TIE
- ACCESSIBLE PATH OF TRAVEL = 5'-0" WIDE
- S STANDARD PARKING SPACE
- C COMPACT PARKING SPACE
- (E) STREET LIGHT

01 SITE PLAN - MASTER PLAN
PROPOSED DESIGN

scale: 1" = 20'

PROJECT INFORMATION:

APPLICATION TYPE: CONDITIONAL USE PERMIT

PROPERTY ADDRESS:
53585 MANE STREET
PIONEERTOWN, CA 92268

LEGAL DESCRIPTION (SEE GRANT DEED EXHIBITS BELOW):

APN:	059439108, 059439107, & 059439106
LOT AREA:	1.84 ACRES
COUNTYWIDE PLAN LAND USE:	C (COMMERCIAL)
ZONING DISTRICT:	SD RES (SPECIAL DEVELOPMENT - RESIDENTIAL)
OCC. TYPE:	SOUNDSTAGE: A-2 COVERED PATIO: A-2 GAZETTE: GROUP B & GROUP M

EXHIBIT A
Legal Description

THE LAND REFERRED TO HEREIN BELOW IS SITUATED PIONEERTOWN, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THE EAST 60.94 FEET OF LOT 316, AS SHOWN ON ASSESSOR'S NO. 13, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 1, PAGES 22 AND 23 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, AND BEING A SUBDIVISION OF SECTION 19, IN TOWNSHIP 1 NORTH, RANGE 5 EAST, SAN BERNARDINO MERIDIAN, ACCORDING TO THE OFFICIAL PLAT THEREOF.

EXCEPTING THEREFROM 1/2 INTEREST IN AND TO ANY AND ALL MINERALS, MINERAL PRODUCTS, CHEMICALS, CHEMICAL SUBSTANCES, ORGANIC AND INORGANIC, METALLIC AND NON-METALLIC, SOLID, LIQUID OR GASEOUS, FISSIONABLE OR NON-FISSIONABLE, RADIOACTIVE OR NON-RADIOACTIVE, ELEMENTS AND COMPOUNDS, AND OIL, GAS, PETROLEUM, NAPHTHA AND OTHER HYDROCARBON SUBSTANCES, IN AND UNDER OR RECOVERABLE FROM THE SAID PORTION OF SAID PROPERTY, AND ANY AND ALL PARTS THEREOF, AS RESERVED IN DEED RECORDED MAY 22, 1964, BOOK 6154, PAGE 315, OFFICIAL RECORDS.

SAID LEGAL DESCRIPTION IS MADE PURSUANT TO CERTIFICATE OF COMPLIANCE NO. S2021-016A, RECORDED JULY 20, 2021, INSTRUMENT NO 2021-0326313, OFFICIAL RECORDS.

EXHIBIT A
Legal Description

THE LAND REFERRED TO HEREIN BELOW IS SITUATED PIONEERTOWN, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

ALL OF LOT 315, EXCEPT THEREFROM THE EASTERLY 51.45 FEET THEREOF, AS SHOWN ON ASSESSOR'S NO. 13, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 1, PAGES 22 AND 23 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, AND BEING A SUBDIVISION OF SECTION 19, IN TOWNSHIP 1 NORTH, RANGE 5 EAST, SAN BERNARDINO MERIDIAN, ACCORDING TO THE OFFICIAL PLAT THEREOF.

EXCEPTING THEREFROM 1/2 INTEREST IN AND TO ANY AND ALL MINERALS, MINERAL PRODUCTS, CHEMICALS, CHEMICAL SUBSTANCES, ORGANIC AND INORGANIC, METALLIC AND NON-METALLIC, SOLID, LIQUID OR GASEOUS, FISSIONABLE OR NON-FISSIONABLE, RADIOACTIVE OR NON-RADIOACTIVE, ELEMENTS AND COMPOUNDS, AND OIL, GAS, PETROLEUM, NAPHTHA AND OTHER HYDROCARBON SUBSTANCES, IN AND UNDER OR RECOVERABLE FROM THE SAID FOREGOING PROPERTY, AND ANY AND ALL PARTS THEREOF, AS RESERVED IN DEED RECORDED MAY 22, 1964, BOOK 6154, PAGE 315, OFFICIAL RECORDS.

SAID LEGAL DESCRIPTION MADE PURSUANT TO CERTIFICATE OF COMPLIANCE NO. S2021-016B, RECORDED JULY 20, 2021, INSTRUMENT NO. 2021-0326314, OFFICIAL RECORDS.

BUILDING INFO:

OCCUPANCY GROUPS:	A, B, M
TYPE OF CONSTRUCTION:	V-B
HEIGHT:	24'-0"
FIRE SPRINKLERS:	NO
GRADING QTY:	NONE
JOSHUA TREE:	NO TRENCHING WITHIN 40' OF JOSHUA TREE WITHOUT AN ARBORIST LETTER
DRAINAGE:	SEE CIVIL / DRAINAGE PLANS

AREA SUMMARY:

	(N)	(E)	BONUS	TOTAL
SOUND STAGE	-	6,223 SF	-	6,223 SF
OUTDOOR DINING	3,024 SF	-	-	3,024 SF
GAZETTE	-	831 SF	-	831 SF
ADA PARKING (IMPERVIOUS)	1,976 SF	-	-	1,976 SF
MINI HORSE KIOSK	145 SF	-	-	145 SF
PUBLIC RESTROOM TRAILER	250 SF	-	-	250 SF
			TOTAL:	12,449 SF

LOT COVERAGE:

LAND USE ZONING	PROPOSED LOT COVERAGE	LOT SIZE	MAX. LOT COVERAGE ALLOWED	TOTAL LOT COVERAGE
RURAL COMMERCIAL	12,449 SF	80,150 SF	80%	12,449 / 80,150 = .15

TOTAL LANDSCAPE AREA PROPOSED: 9,095 SQ. FT.: 11.35% OF 80,150 SQ.FT.

SCOPE OF WORK:

PROJECT SCOPE:

1. TENANT IMPROVEMENT OF SOUNDSTAGE VENUE TO INCLUDE NEW ADA RESTROOMS, ADA PARKING, BAR AREA, LOUNGE.
2. NEW COVERED OUTDOOR DINING AREA.
3. MOBILE KITCHEN TRAILER - SELF CONTAINED
4. PUBLIC RESTROOM TRAILER
5. NEW SEPTIC WASTE SYSTEM.
6. NEW COFFEE SHOP @ EXISTING GAZETTE
7. MINI HORSE TRAILER KISOK

SHEET INDEX:

ARCHITECTURAL PLANS:
A-0.1 PROJECT DATA, NOTES & SITE PLAN

BLU HAUS DESIGN | BUILD

BLU HAUS DESIGN INC.
BY ART MARQUEZ

61416 29 PALMS HWY #1953
JOSHUA TREE, CA 92252

626-235-8751
ART@BLUHAUSDESIGN.COM

ART MARQUEZ, B. ARCH
CRC R106 & BUSINESS AND PROFESSIONS CODE 5536.2

DATE	ISSUED FOR
26-0923	COUNTY RESUBMITTAL

DATE	REVISION

THIS DOCUMENT AND THE DESIGNS, ARRANGEMENTS, DEPICTIONS, IDEAS AND OTHER INFORMATION CONTAINED HEREIN CONSTITUTE UNPUBLISHED WORK OF BLU HAUS AND SHALL REMAIN PROPERTY OF BLU HAUS. THIS DOCUMENT SHALL NOT BE USED, REPRODUCED, COPIED, DISCLOSED, DISTRIBUTED, SOLD, PUBLISHED OR OTHERWISE USED IN ANYWAY WITHOUT THE ADVANCED EXPRESS WRITTEN CONSENT OF BLU HAUS. ANY UNAUTHORIZED USE OF THIS DOCUMENT OR ANY PART THEREOF, SHALL CONSTITUTE CONCLUSIVE EVIDENCE OF ACCEPTANCE OF THESE RESTRICTIONS.

PROJECT:

CUP - TENANT IMPROVEMENT

ADDRESS:

53585 MANE STREET
PIONEERTOWN, CA 92268

SHEET TITLE:

TITLE PAGE
SITE PLAN

PROJECT: SOUNDSTAGE

DATE: 26-0923

DRAWN BY: ART MARQUEZ

SCALE: AS NOTED

SHEET:

A0.1

PRINT ON ARCH E (30X42)

EXHIBIT A-2

RAWHIDE ROAD

WILLIAM S. HART RD.

LOT 52

4040

10000
4037.099
SET 2X2 W/ TACK 10100

POLE LINE
2284/6

30' COUNTY ROAD EASEMENT PER INST. # 2020-0357764

60' PRIVATE ROAD EASEMENT PER OM 1/22-23

DIRT ROAD EDGE

165.95'

236.81'

DIRT ROAD EDGE

DIRT ROAD EDGE

333.31'

333.20'

GUNSIGHT ROAD

60' PRIVATE ROAD
EASEMENT PER OM 1/22-23

POLE LINE EASEMENT PER O.R.
2284/61-62 (NO WIDTH)

198.06'

40'

65'

132'

89.11'

42.89'

42'

ASSESSOR'S MAP No. 13
O.M. 1" / 22-23

LOT 309

A.P.N. 0594-212-15

LOT 310

A.P.N. 0594-212-34

A.P.N. 0594-212-37

308

DECK
CONC

MANE STREET

166.03'

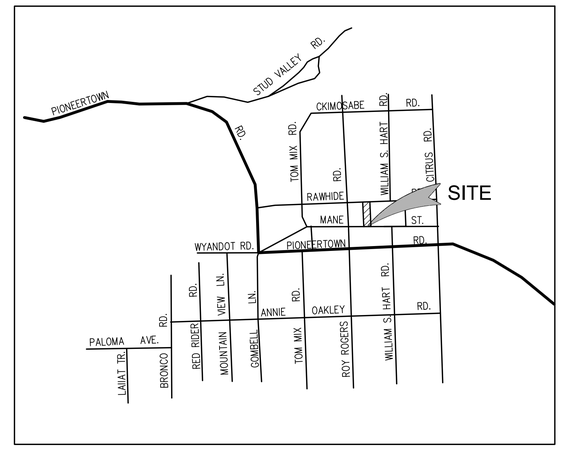
50.02'

60.98'

76.97'

114.60'

89.08'



VICINITY MAP
NO SCALE

6 FOOT WOOD FENCE

DIRT ROAD

ROAD EASEMENT

PROPERTY LINE(S)

EXISTING DIRT ROAD/
TRAVEL WAY

NORTH
SCALE: 1"= 20'

20' 0' 20' 40' 60'
GRAPHIC SCALE: 1" = 20'

PREPARED BY:

TRANSTECH

CIVIL ENGINEERING,
LAND SURVEYING
AND BUILDING DESIGN
413 MACKAY DRIVE
SAN BERNARDINO, CA. 92408
PH. (909) 384-7464
FAX (909) 384-7475

SAN BERNARDINO COUNTY

PIONEER TOWN LAND CO.
PARKING LAYOUT
APN. 0594-212-15

DRAWN BY:	DATE:	SCALE:	SHEET:	JOB NO.
GDA	09/22/2026	1"= 20'	1 OF 1	211317

211317 parking layout mane st alt3.dwg

EXHIBIT B

EXHIBIT B

FINDINGS: CONDITIONAL USE PERMIT

A CONDITIONAL USE PERMIT TO RENOVATE AN EXISTING 6,223 SQ. FT. BUILDING TO OPERATE A PRIVATE MEETING FACILITY (SOUND STAGE) FOR HOSPITALITY EVENTS; INTERIOR REMODEL AND REFURBISH AN EXISTING 842 SQ. FT. BUILDING (GAZETTE BUILDING) TO OPERATE A COFFEE AND ICE CREAM SHOP; AND CONSTRUCT A 3,024 SQ. FT. PUBLIC SHADE PAVILION WITH PICNIC TABLES, TOGETHER WITH ACCESSORY AND ANCILLARY MODULAR STRUCTURES TO SERVE AS PUBLIC RESTROOMS, MOBILE SNACK CART/KIOSK, AND A SELF-CONTAINED MOBILE KITCHEN (PROJECT) AS SHOWN ON THE APPROVED SITE PLAN ON AN APPROXIMATE 1.84 ACRE SITE (PROJECT SITE), IN THE SPECIAL DEVELOPMENT-RESIDENTIAL (SD-RES) ZONING DISTRICT. THE SUBJECT PARCELS ARE LOCATED IN THE COMMUNITY OF PIONEERTOWN; 3RD SUPERVISORIAL DISTRICT; PROJECT NUMBER PROJ-2022-00191.

The following are the required findings, per the San Bernardino County Development Code (Development Code) Section 85.06.040, and supporting facts for approval of the Conditional Use Permit:

1. **THE SITE FOR THE PROPOSED USE IS ADEQUATE IN TERMS OF SHAPE AND SIZE TO ACCOMMODATE THE PROPOSED USE AND ALL LANDSCAPING, OPEN SPACE, SETBACKS, WALLS AND FENCES, YARDS, AND OTHER REQUIRED FEATURES PERTAINING TO THE APPLICATION.**

   The Project Site is 1.84 acres in size and is of adequate size and shape to accommodate the proposed Pioneertown Sound Stage private meeting facility and Pioneertown Gazette ice cream parlor and coffee shop. Both existing historic buildings can adequately accommodate the operations because the proposed ingress and egress, internal circulation, landscaping, lot coverage, all setbacks, and fences meet the requirements of the Development Code for the land use and zoning designations. The required parking is met with onsite and offsite parking through a condition requiring a site plan permit and parking agreement with an existing parking lot/business to meet the deficient onsite parking.

2. **THE SITE FOR THE PROPOSED USE HAS ADEQUATE ACCESS, WHICH MEANS THAT THE SITE DESIGN INCORPORATES APPROPRIATE STREET AND HIGHWAY CHARACTERISTICS TO SERVE THE PROPOSED USE.**

   The site design and Conditions of Approval for the Project ensure adequate legal and physical access to the site from Pioneertown Road. The Project's site plan has been reviewed by the County's Land Use Services and Public Works departments and conditioned the Project to provide adequate access to the abutting road which is a SBCO maintained road. On-site circulation drive aisles meet San Bernardino County Traffic Division and Fire Protection District standards.

3. **THE PROPOSED USE WILL NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON ABUTTING PROPERTY OR THE ALLOWED USE OF THE ABUTTING PROPERTY, WHICH MEANS THE USE WILL NOT GENERATE EXCESSIVE NOISE, TRAFFIC, VIBRATION, LIGHTING, GLARE, OR OTHER DISTURBANCE. IN ADDITION, THE USE**

EXHIBIT B

WILL NOT SUBSTANTIALLY INTERFERE WITH THE PRESENT OR FUTURE ABILITY TO USE SOLAR ENERGY SYSTEMS.

The Project establishes allowed uses to two (2) existing buildings within the Special Development-Residential (SD-RES) Zoning District within the community of Pioneertown. The Project is adjacent to other Pioneertown historically identified commercial structures and properties to the east, north, south, and vacant land to the west across Pioneertown Road where there is a residential neighborhood. Abutting to the north and next to the Pioneertown Gazette, there is a vacant parcel undergoing construction of a single-family dwelling that will front Mane Street. The existing building will be refurbished to accommodate the new uses without negatively impacting the exterior and abutting properties.

The Project also introduces two quasi-public ancillary uses and structures in the form of a pavilion shade-structure with picnic tables and additional portable bathrooms that are both open to the public to accommodate visitors and pedestrian traffic. The pavilion will provide a respite from the sun, and the additional portable bathrooms, with compatible design, will provide a safe and sanitary option for all Pioneertown visitors in partnership with the County.

Project Conditions of Approval address Development Code allowances and thresholds for parking, noise, traffic, vibrations, lighting, glare, or other disturbance, as well as for offsite and onsite driveway and street improvements. Project improvements have been designed to incorporate development performance standards and setbacks. In particular, the spacing and layout of the existing building and new ancillary accessory structures are designed to follow the SD-RES Zoning District Development Code Standards set forth in Section 82.06.060 of the Development Code, and the required parking per Section 83.11.030 of the Development Code has been met. The proposed Project also does not interfere with the future ability to use solar energy systems.

4. THE PROPOSED USE AND MANNER OF DEVELOPMENT ARE CONSISTENT WITH THE GOALS, MAPS, POLICIES, AND STANDARDS OF THE COUNTY GENERAL PLAN AND ANY APPLICABLE COMMUNITY OR SPECIFIC PLAN.

The Conditional Use Permit, together with the provisions for its design and improvement are consistent with the Countywide Plan's Policy Plan. The Project as designed specifically is consistent with the goals, policies, standards and maps of the Policy Plan and implements the following goals and policies:

- Policy LU-2.1 Compatibility with existing uses. We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods.

  Consistency: *The Project is appropriate because the uses are allowed in the SD-RES zone subject to a land use entitlement of a Conditional Use Permit (CUP) and compatible with the size and scale of the surrounding commercial characteristics. The Project site is currently developed with the historic Pioneertown Silver Dollar (Sound Stage) and the Pioneertown Gazette on the parcels fronting Mane Street. The Project's proposed exterior elevations for the existing and new building are consistent with the "western town"*

EXHIBIT B

characteristics and designed to be sensitive to surrounding properties and the environment.

- Policy LU-2.4 Land Use Map consistency. We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity.

  Consistency: *The Project is consistent with the Land Use Map and does not propose a change in the Land Use Category. As designed, the proposed uses are compatible and consistent with surrounding land uses and community's identity.*

- Policy LU-4.5 Community Identity. We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.

  Consistency: *The Project is consistent with and reinforces Pioneertown's established physical and historical character. The Project is located within the Pioneertown Mane Street Historic District and primarily involves the continued use and rehabilitation of the historic Pioneertown Soundstage (Silver Dollar) and Pioneertown Gazette, both contributing structures to the historic district. New improvements, including the outdoor pavilion and associated accessory structures, are designed to complement the scale and Western architectural character of Mane Street through the use of wood materials, boardwalks, signage, and other design features consistent with the historic setting. The Project also retains existing native vegetation and incorporates native, drought-tolerant landscaping to maintain the surrounding desert character.*

  The Project is also consistent with the values identified in the Pioneertown Community Action Guide, including preservation of the western history and culture. The Project rehabilitates and adaptively reuses existing historic commercial structures rather than replacing them with development inconsistent with the Mane Street setting, and Mitigation Measure CUL-1 requires the Project to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The proposed pavilion and public amenities further support Pioneertown's pedestrian-oriented Mane Street and provide gathering and respite space for residents and visitors. Accordingly, the Project's design, rehabilitation of historic resources, and community-serving uses are consistent with and reinforce Pioneertown's physical and historical identity as contemplated by Policy LU-4.5.

- Policy CR-1.1 Tribal notification and coordination. We notify and coordinate with tribal representatives in accordance with state and federal laws to strengthen our working relationship with area tribes, avoid inadvertent discoveries of Native American archeological sites and burials, assist with the treatment and disposition of inadvertent discoveries, and explore options of avoidance of cultural resources early in the planning process.

EXHIBIT B

Consistency: *The County initiated tribal consultation on December 6, 2023, to offer an opportunity for the designated tribes to consult with the County on the proposed Project. Upon the 30-day required notification period, the County received letters from the Twenty-Nine Band of Mission Indians, which determined the Project site outside of the known Chemehuevi Traditional Use Area.*

5. THERE IS SUPPORTING INFRASTRUCTURE, EXISTING OR AVAILABLE, CONSISTENT WITH THE INTENSITY OF THE DEVELOPMENT, TO ACCOMMODATE THE PROPOSED PROJECT WITHOUT SIGNIFICANTLY LOWERING SERVICE LEVELS.

The Project currently has access from Pioneertown Road, a SBCO maintained road. The Project's new established uses will increase water demand, expand wastewater treatment, and additional gas and electrical services.

The Environmental Health Services Department has reviewed the Project and has conditioned the Project to add an additional or separate septic system to serve the upgraded facilities as shown on the site plan (Exhibit A), and in the conditions of approval (Exhibit C).

Electrical and gas utilities will be upgraded through permits processed by the Land Use Services Department, Building and Safety Division, in coordination with the private utilities.

6. THE LAWFUL CONDITIONS STATED IN THE APPROVAL ARE DEEMED REASONABLE AND NECESSARY TO PROTECT THE OVERALL PUBLIC HEALTH, SAFETY AND GENERAL WELFARE.

The conditions of approval include measures that require the applicant/developer to comply with the performance measures outlined in the Development Code. Therefore, the conditions stated in the approval are deemed necessary to protect the public health, safety and general welfare.

7. THE DESIGN OF THE SITE HAS CONSIDERED THE POTENTIAL FOR THE USE OF SOLAR ENERGY SYSTEMS AND PASSIVE OR NATURAL HEATING AND COOLING OPPORTUNITIES.

The proposed Project was designed in a manner to not interfere with the future ability for the property owner to install a solar energy system. The Project would not impede development of solar energy generation systems on adjacent parcels.

EXHIBIT B

ADDITIONAL FINDINGS FOR OFF-SITE PARKING

8. THERE ARE EXCEPTIONAL OR EXTRAORDINARY CIRCUMSTANCES OR CONDITIONS APPLICABLE TO THE SUBJECT PROPERTY OR TO THE INTENDED USE THAT DO NOT APPLY TO OTHER PROPERTIES IN THE SAME VICINITY AND LAND USE ZONING DISTRICT.

The Sound Stage building (former Silver Dollar) was originally built like a barn to be used as a sound stage for filming parts of western movies. The Project site was capable of accommodating all the necessary parking for the operation of a sound stage. Currently, the Sound Stage building has been adaptively refurbished to create a private meeting facility with occasional musical programming and as a wedding venue. As such, the parking area on the Project site is not sufficient to accommodate the required parking for the proposed land use components of the proposed Project. Therefore, the Project has been conditioned to establish offsite parking to meet the required parking that cannot be accommodated on the Project site. The condition of approval for the Project shall be in accordance with Section 83.11.030(e). The off-site parking shall be developed, maintained, and used in accordance with the approved Site Plan Permit and parking agreement.

9. THE STRICT APPLICATION OF THE LAND USE ZONING DISTRICT DEPRIVES THE SUBJECT PROPERTY OF PRIVILEGES ENJOYED BY OTHER PROPERTIES IN THE VICINITY OR IN THE SAME LAND USE ZONING DISTRICT.

As an adaptive reuse of a historical soundstage to a meeting facility, the current zoning district parking requirements would substantially restrict the Sound Stage from being an effective meeting facility because the current open floor plan configuration of the subject building would have to be restricted for use due to its size. The parts of interior of the building would have to be restricted to a size that would limit the use based on the amount of parking that can be accommodated on site. Restricting parts of the Sound stage building would be a physical burden and render portions of the existing historic building unusable. There are other venues in Pioneertown that utilize shared parking and/or lease parking from offsite locations that are not part of the actual venue properties. Allowing the applicant to utilize an owned parcel across the street to fulfill required parking would be a privilege that other properties are currently using. Therefore, the Project has been conditioned to establish offsite parking to meet the required parking that cannot be accommodated on the Project site. The condition of approval for the Project shall be in accordance with Section 83.11.030(e). The off-site parking shall be developed, maintained, and used in accordance with the approved Site Plan Permit and parking agreement.

EXHIBIT B

FINDINGS: CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

10. THE PROJECT WILL NOT HAVE A SIGNIFICANT ADVERSE IMPACT ON THE ENVIRONMENT.

The environmental findings, in accordance with Section 85.03.040 of the San Bernardino County Development Code, are as follows:

Pursuant to provisions of the California Environmental Quality Act (CEQA) and the San Bernardino County Environmental Review guidelines, the County finds that there is no substantial evidence in light of the whole record that the above-referenced Project may have a significant effect on the environment with the implementation of the required mitigation measures. A Mitigated Negative Declaration (MND) is adopted. The MND represents the independent judgment and analysis of the County acting as lead agency for the Project.

EXHIBIT C

Conditions of Approval

Record:	PROJ-2022-00191	**System Date:**	10/29/2026
Record Type:	Project Application	**Primary APN:**	0594391080000
Record Status:	Approved	**Application Name:**	SOUND STAGE- CONDITIONAL USE PERMIT
Effective Date:	November 20, 2026	**Expiration Date:**	November 19, 2029

Description: A CONDITIONAL USE PERMIT TO RENOVATE AN EXISTING 6,223 SQ. FT. BUILDING TO OPERATE A PRIVATE MEETING FACILITY FOR HOSPITALITY EVENTS; INTERIOR REMODEL AND REFURBISH AN EXISTING 831 SQ. FT. BUILDING TO OPERATE A COFFEE AND ICE CREAM SHOP; CONSTRUCT A 3,024 SQ. FT. PUBLIC SHADE PAVILION WITH PICNIC TABLES, TOGETHER WITH ACCESSORY AND ANCILLARY MODULAR STRUCTURES TO SERVE AS PUBLIC RESTROOMS, MOBILE SNACK CART/KIOSK, AND A SELF-CONTAINED MOBILE KITCHEN ON A 1.84 ACRE SITE.

This document does not signify project approval.

If the project has been approved, then an effective date and an expiration date for these conditions can be found below. This content reflects County records as at the System Date and time below.

The following conditions of approval have been imposed for the project identified below. The applicant/developer shall complete all conditions of approval stipulated in the approval letter.

Conditions of Approval are organized by project phase, then by status, and finally by department imposing the condition.

On-going conditions must be complied with at all times. For assistance interpreting the content of this document, please contact the Land Use Services Department Planning Division.

Contact information is provided at the end of this document for follow-up on individual conditions.

ON-GOING

Land Use Services - Planning

1 **Continuous Effect/Revocation** - Status: Outstanding
All of the conditions of this project approval are continuously in effect throughout the operative life of the project for all approved structures and approved land uses/activities. Failure of the property owner or developer to comply with any or all of the conditions at any time may result in a public hearing and possible revocation of the approved land use, provided adequate notice, time and opportunity is provided to the property owner, developer or other interested party to correct the non-complying situation.

2 **Continuous Maintenance** - Status: Outstanding
The Project property owner shall continually maintain the property so that it is visually attractive and not dangerous to the health, safety and general welfare of both on-site users (e.g. employees) and surrounding properties. The property owner shall ensure that all facets of the development are regularly inspected, maintained and that any defects are timely repaired. Among the elements to be maintained, include but are not limited to:
a) Annual maintenance and repair: The developer shall conduct inspections for any structures, fencing/walls, driveways,

and signs to assure proper structural, electrical, and mechanical safety.
b) Graffiti and debris: The developer shall remove graffiti and debris immediately through weekly maintenance.
c) Landscaping: The developer shall maintain landscaping in a continually healthy thriving manner at proper height for required screening. Drought-resistant, fire-retardant vegetation shall be used where practicable. Where landscaped areas are irrigated it shall be done in a manner designed to conserve water, minimizing aerial spraying.
d) Dust control: The developer shall maintain dust control measures on any undeveloped areas where landscaping has not been provided.
e) Erosion control: The developer shall maintain erosion control measures to reduce water runoff, siltation, and promote slope stability.
f) External Storage: The developer shall maintain external storage, loading, recycling and trash storage areas in a neat and orderly manner and fully screened from public view. Outside storage shall not exceed the height of the screening walls.
g) Metal Storage Containers: The developer shall NOT place metal storage containers in loading areas or other areas unless specifically approved by this or subsequent land use approvals.
h) Screening: The developer shall maintain screening that is visually attractive. All trash areas, loading areas, mechanical equipment (including roof top) shall be screened from public view.
i) Signage: The developer shall maintain all on-site signs, including posted area signs (e.g. "No Trespassing") in a clean readable condition at all times. The developer shall remove all graffiti and repair vandalism on a regular basis. Signs on the site shall be of the size and general location as shown on the approved site plan or subsequently a County-approved sign plan.
j) Lighting: The developer shall maintain any lighting so that they operate properly for safety purposes and do not project onto adjoining properties or roadways. Lighting shall adhere to applicable glare and night light rules.
k) Parking and on-site circulation: The developer shall maintain all parking and on-site circulation requirements, including surfaces, all markings and traffic/directional signs in an un-faded condition as identified on the approved site plan. Any modification to parking and access layout requires the Planning Division review and approval. The markings and signs shall be clearly defined, un-faded and legible; these include parking spaces, disabled space and access path of travel, directional designations and signs, stop signs, pedestrian crossing, speed humps and "No Parking", "Carpool", and "Fire Lane" designations.
l) Fire Lanes: The developer shall clearly define and maintain in good condition at all times all markings required by the Fire Department, including "No Parking" designations and "Fire Lane" designations.

3 **Project Approval Description** - Status: Outstanding
This Conditional Use Permit is conditionally approved to renovate a private meeting facility with a maximum occupancy of 300 persons, coffee shop with ice cream parlor, construct a new shade structure for all Pioneertown visitors, public restrooms, mobile kitchen, and snack/retail kiosk in compliance with the San Bernardino County Code (SBCC), California Building Codes (CBC), the San Bernardino County Fire Code (SBCFC), the following Conditions of Approval, the approved site plan, and all other required and approved reports and displays (e.g. elevations). At no time shall the meeting facility occupancy limit exceed 300 persons, including concurrent use by an event of the shade structure and the "outdoor patio area" of the meeting facility. The developer shall provide a copy of the approved conditions and the approved site plan to every current and future project tenant, lessee, and property owner to facilitate compliance with these Conditions of Approval and continuous use requirements for the Project.

4 **Project Location** - Status: Outstanding
The Project site is located at 53585 Mane Street, Pioneertown, California.

5 **Revisions** - Status: Outstanding
Any proposed change to the approved Project and/or conditions of approval shall require that an additional land use application (e.g. Revision to an Approved Action) be submitted to County Land Use Services for review and approval.

6 **Indemnification** - Status: Outstanding
In compliance with SBCC §81.01.070, the developer shall agree, to defend, indemnify, and hold harmless the County or its "indemnitees" (herein collectively the County's elected officials, appointed officials (including Planning Commissioners), Zoning Administrator, agents, officers, employees, volunteers, advisory agencies or committees, appeal boards or legislative body) from any claim, action, or proceeding against the County or its indemnitees to attack, set aside, void, or annul an approval of the County by an indemnitee concerning a map or permit or any other action relating to or arising out of County approval, including the acts, errors or omissions of any person and for any costs or expenses incurred by the indemnitees on account of any claim, except where such indemnification is prohibited by law. In the alternative, the developer may agree to relinquish such approval. Any condition of approval imposed in compliance with the County Development Code or County General Plan shall include a requirement that the County acts reasonably to promptly notify the developer of any claim, action, or proceeding and that the County cooperates fully in the defense. The developer shall reimburse the County and its indemnitees for all expenses resulting from such actions, including any court costs and attorney fees, which the County or its indemnitees may be required by a court to pay as a result of such action. The County may, at its sole discretion, participate at its own expense in the defense of any such action, but such participation shall not relieve the developer of their obligations under this condition to reimburse the County or its indemnitees for all such expenses. This indemnification provision shall apply regardless of the existence or degree of fault of indemnitees. The developer's indemnification obligation applies to the indemnitees' "passive" negligence but does not apply to the indemnitees' "sole" or "active" negligence or "willful misconduct" within the meaning of Civil Code Section 2782.

7 **Expiration** - Status: Outstanding
This project permit approval shall expire and become void if it is not "exercised" within three (3) years of the effective date of this approval, unless an extension of time is approved. The permit is deemed "exercised" when either:
(a.) The permittee has commenced actual construction or alteration under a validly issued building permit, or
(b.) The permittee has substantially commenced the approved land use or activity on the project site, for those portions of the project not requiring a building permit. (SBCC §86.06.060)
(c.) Occupancy of approved land use, occupancy of completed structures and operation of the approved and exercised land use remains valid continuously for the life of the project and the approval runs with the land, unless one of the following occurs:
- Construction permits for all or part of the project are not issued or the construction permits expire before the structure is completed and the final inspection is approved.
- The land use is determined by the County to be abandoned or non-conforming.
- The land use is determined by the County to be not operating in compliance with these conditions of approval, the County Code, or other applicable laws, ordinances or regulations. In these cases, the land use may be subject to a revocation hearing and possible termination.
PLEASE NOTE: This will be the ONLY notice given of this approval's expiration date. The developer is responsible to initiate any Extension of Time application.

8 **Extension of Time** - Status: Outstanding
Extensions of time to the expiration date (listed above or as otherwise extended) may be granted in increments each not to exceed an additional three (3) years beyond the current expiration date. An application to request consideration of an extension of time may be filed with the appropriate fees no less than thirty days before the expiration date. Extensions of time may be granted based on a review of the application, which includes a justification of the delay in construction and a plan of action for completion. The granting of such an extension request is a discretionary action that may be subject to additional or revised conditions of approval or site plan modifications. (SBCC §86.06.060)

9 **Project Account** - Status: Outstanding
The Project account number is PROJ-2022-00191. This is an actual cost project with a deposit account to which hourly charges are assessed by various county agency staff (e.g. Land Use Services, Public Works, and County Counsel). Upon notice, the "developer" shall deposit additional funds to maintain or return the account to a positive balance. The

"developer" is responsible for all expense charged to this account. Processing of the project shall cease, if it is determined that the account has a negative balance and that an additional deposit has not been made in a timely manner. A minimum balance of $1,000.00 must be in the project account at the time the Condition Compliance Review is initiated. Sufficient funds must remain in the account to cover the charges during each compliance review. All fees required for processing shall be paid in full prior to final inspection, occupancy and operation of the approved use.

10 **Hours of Operation** - Status: Outstanding
The following shall be the allowed hours of operation per the Letter of Intent:
Pioneertown Sound Stage Monday 11am to 3pm for lunch then 6pm to 10pm for dinner or events Tuesday Closed Wednesday Closed Thursday 11am to 3pm for lunch then 6pm to 10pm for dinner or events Friday 11am to 2am Saturday 11am to 2am Sunday 11am to 3pm for lunch then 6pm to 10pm for dinner or events
Pioneertown Gazette (Coffee Shop & Ice Cream Parlor) Monday, Thursday - Sunday 7am to 3pm for breakfast and lunch Tuesday, Wednesday Closed
Mobile Kitchen, Kiosk, and Shade Structure Monday – Sunday – 7 a.m. – 10 p.m.

11 **Performance Standards** - Status: Outstanding
The approved land uses shall operate in compliance with the general performance standards listed in the County Development Code Chapter 83.01, regarding air quality, electrical disturbance, fire hazards (storage of flammable or other hazardous materials), heat, noise, vibration, and the disposal of liquid waste

12 **Lighting** - Status: Outstanding
Lighting shall comply with Table 83-7 "Shielding Requirements for Outdoor Lighting in the Mountain Region and Desert Region" of the County's Development Code (i.e. "Dark Sky" requirements). All lighting shall be limited to that necessary for maintenance activities and security purposes. This is to allow minimum obstruction of night sky remote area views. No light shall project onto adjacent roadways in a manner that interferes with on-coming traffic. All signs proposed by this project shall only be lit by steady, stationary, shielded light directed at the sign, by light inside the sign, by direct stationary neon lighting or in the case of an approved electronic message center sign, an alternating message no more than once every five seconds.

13 **Underground Utilities** - Status: Outstanding
No new above-ground power or communication lines shall be extended to the site. All required utilities shall be placed underground in a manner that complies with the California Public Utilities Commission General Order 128, and avoids disturbing any existing/natural vegetation or the site appearance.

14 **Construction Hours** - Status: Outstanding
Construction will be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday in accordance with the County of San Bernardino Development Code standards. No construction activities are permitted outside of these hours or on Sundays and Federal holidays.

15 **Construction Noise** - Status: Outstanding
The following measures shall be adhered to during the construction phase of the project:
- All construction equipment shall be muffled in accordance with manufacturer's specifications.
- All construction staging shall be performed as far as possible from occupied dwellings. The location of staging areas shall be subject to review and approval by the County prior to the issuance of grading and/or building permits.
- All stationary construction equipment shall be placed in a manner so that emitted noise is directed away from sensitive receptors (e.g. residences and schools) nearest the project site.

16 **GHG - Operational Standards** - Status: Outstanding
The developer shall implement the following as greenhouse gas (GHG) mitigation during the operation of the approved project:
a. Waste Stream Reduction. The "developer" shall provide to all tenants and project employees County-approved informational materials about methods and need to reduce the solid waste stream and listing available recycling services.
b. Vehicle Trip Reduction. The "developer" shall provide to all tenants and project employees County-approved informational materials about the need to reduce vehicle trips and the program elements this project is implementing. Such elements may include: participation in established ride-sharing programs, creating a new ride-share employee vanpool, designating preferred parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles with benches in waiting areas, and/or providing a web site or message board for coordinating rides.
c. Provide Educational Materials. The developer shall provide to all tenants and staff education materials and other publicity about reducing waste and available recycling services. The education and publicity materials/program shall be submitted to County Planning for review and approval. The developer shall also provide to all tenants and require that the tenants shall display in their stores current transit route information for the project area in a visible and convenient location for employees and customers.
d. Landscape Equipment. The developer shall require in the landscape maintenance contract and/or in onsite procedures that a minimum of 20% of the landscape maintenance equipment shall be electric-powered.

17 **Public Restrooms** - Status: Outstanding
If the Department of Public Works approves the permanent or temporary use and location to operate restrooms on the Project site, maintenance of the restrooms to be provided by County forces or by the applicant. If applicant maintained, the applicant shall have a valid annual Special Use Permit (SUP) at all times to operate a "public restroom". The Department of Land Use Services Planning Division in collaboration with the Department of Public Works will monitor with an annual SUP filed with the Code Enforcement Division demonstrating a required service agreement with a local waste management service provider for the regular sanitary maintenance of the portable bathrooms.

Public Health– Environmental Health Services

18 **Noise Levels** - Status: Outstanding
Noise level shall be maintained at or below County Standards, Development Code Section 83.01.080.

19 **OWTS Maintenance** - Status: Outstanding
The onsite wastewater treatment system shall be maintained so as not to create a public nuisance and shall be serviced by an EHS permitted pumper.

20 **Refuse Storage and Disposal** - Status: Outstanding
All refuse generated at the premises shall at all times be stored in approved containers and shall be placed in a manner so that environmental public health nuisances are minimized. All refuse not containing garbage shall be removed from the premises at least 1 time per week, or as often as necessary to minimize public health nuisances. Refuse containing garbage shall be removed from the premises at least 2 times per week, or as often if necessary to minimize public health nuisances, by a permitted hauler to an approved solid waste facility in conformance with San Bernardino County Code Chapter 8, Section 33.0830 et. seq.

INFORMATIONAL

County Fire - Community Safety

21 **Additional Requirements** - Status: Outstanding
ADDITIONAL REQUIREMENTS: 1. Show the 26' Fire Department access on the plans per Standard A-1

22 **F01 Jurisdiction** - Status: Outstanding
The above referenced project is under the jurisdiction of the San Bernardino County Fire Department herein "Fire Department". Prior to any construction occurring on any parcel, the applicant shall contact the Fire Department for verification of current fire protection requirements. All new construction shall comply with the current California Fire Code requirements and all applicable statutes, codes, ordinances, and standards of the Fire Department.

23 **F03 Fire Condition Letter Expiration** - Status: Outstanding
Fire Condition Letters shall expire on the date determined by the Planning Division or Building and Safety.

24 **F04 Fire Permit Expiration** - Status: Outstanding
Construction permits shall automatically expire and become invalid unless the work authorized such permit is commenced within 180 days after its issuance, or if the work authorized by such permit is suspended or abandoned for a period of 180 days after the time the work is commenced. Suspension or abandonment shall mean that no inspection by the Department has occurred with 180 days of any previous inspection. After a construction permit becomes invalid and before such previously approved work recommences, a new permit shall be first obtained and the fee to recommence work shall be one-half the fee for the new permit for such work, provided no changes have been made or will be made in the original construction documents for such work, and provided further that such suspension or abandonment has not exceeded one year. A request to extend the permit may be made in writing PRIOR TO the expiration date justifying the reason that the permit should be extended.

25 **F15 Access – 30% slope** - Status: Outstanding
Where the natural grade between the access road and building is in excess of thirty percent (30%), an access road shall be provided within one hundred and fifty (150) feet of all buildings. Where such access cannot be provided, a fire protection system shall be installed. Plans shall be submitted to and approved by the Fire Department.

26 **F20 Access – 150+ feet** - Status: Outstanding
Roadways exceeding one hundred fifty (150) feet in length shall be approved by the Fire Department. Roadways shall be extended to within one hundred fifty (150) feet of and shall give reasonable access to all portions of the exterior walls of the first story of any building.

27 **F66 Compressed Gasses/Beverage Dispensing** - Status: Outstanding
A submittal of compressed gasses in storage or use including asphyxiant, irritant, and radioactive gasses complying with the California Fie Code, California Mechanical Code, and NFPA is required. The applicant shall hire a licensed contractor to submit plans for review and approval by the fire department. The required fees shall be paid at the time of plan submittal.

28 **F70 Additional Requirements** - Status: Outstanding
In addition to the Fire requirements stated herein, other onsite and off-site improvements may be required which cannot be determined at this time and would have to be reviewed after more complete improvement plans and profiles have been submitted to this office.

Land Use Services - Land Development

29 **Tributary Drainage** - Status: Outstanding
Adequate provisions should be made to intercept and conduct the tributary off-site and on-site 100-year drainage flows around and through the site in a manner that will not adversely affect adjacent or downstream properties at the time the site is developed. The project site shall be designed in a manner that perpetuates the existing natural drainage patterns with respect to tributary drainage areas, outlet points and outlet conditions.

Public Works - Solid Waste Management

30 **Franchise Hauler Service Area** - Status: Outstanding
This project falls within a County Franchise Area. If subscribing for the collection and removal of construction and demolition waste from the project site, all developers, contractors, and subcontractors shall be required to receive services through the grantee holding a franchise agreement in the corresponding County Franchise Area (Burrtec Waste and Recycling).

31 **Mandatory Commercial Organics Recycling** - Status: Outstanding
California Assembly Bill (AB) 1826 requires businesses that generate two (2) cubic yards or more of solid waste per week to recycle their organic waste (includes green waste and food waste). A business that is a property owner may require a lessee or tenant of that property to source separate their organic waste to aid in compliance. Additionally, all businesses that contract for gardening or landscaping services must stipulate that the contractor recycle the resulting gardening or landscaping waste. Residential multifamily dwellings of five (5) or more units are required to recycle organics; however, they are not required to arrange for recycling services specifically for food waste. Applicant will be required to report to the County or contract waste hauler on efforts to recycle organics materials once operational.

32 **Mandatory Commercial Recycling** - Status: Outstanding
California Assembly Bill (AB) 341 requires businesses that generate 4 or more cubic yards of solid waste per week or is a multi-family residential dwelling of 5 units or more to arrange for recycling services. The County is required to monitor commercial recycling and will require businesses to provide recycling information. Applicant will be required to report to the County or contract waste hauler on recycling efforts once operational.

33 **Recycling and Organic Waste Collection Container Information** - Status: Outstanding
California Assembly Bill (AB) 827 and Senate Bill (SB) 1383 require businesses that sell products meant for immediate consumption and currently provide trash collection containers for their customers to provide recycling and/or organics collection containers adjacent to trash containers at front-of-house, except in restrooms. Full-service restaurants are exempt from these requirements as long as they provide containers for employees to separate post-consumer recyclables and organic waste purchased on the premise for customers.

34 **Recycling Storage Capacity** - Status: Outstanding
The 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 California Assembly Bill (AB) 2176.

PRIOR TO LAND DISTURBANCE

Land Use Services - Planning

35 **Other Agency Condition** - Status: Outstanding
The Mojave Desert Air Quality Management District requires that fugitive dust best management practices (including but not limited to applicable provisions of District Rule 403) are implemented on all non-paved transport roads, access points, and parking areas. The District also requires that the proponent obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including but not limited to; fuel storage and dispensing equipment, and internal combustion engines with a manufacture's maximum continuous rating greater than or equal to 50 brake horsepower. Additionally, an asbestos survey is required for any demolition or renovation of existing buildings. MDAQMD asbestos informational flowchart and notification forms are available at https://www.mdaqmd.ca.Qov/permittinu/asbestos-information.

36 **State Agency Condition** - Status: Outstanding
The California Water Boards-Colorado River Basin Regional Water Quality Control Board may require development of Stormwater Pollution Prevention Plan and NPDES General Industrial Stormwater Permit. This permit is accessible on the State Board's Homepage (https://www.waterboards.ca.gov/water_issues/programs/stormwater/). Best Management Practices must be used to mitigate project impacts.

37 **Mitigation Measures** - Status: Outstanding
Please see Mitigation Monitoring and Reporting Program for mitigation measures to be completed prior to grading permit issuance.

38 **Joshua Tree Relocation Plan** - Status: Outstanding
With respect to reestablishing two (2) Joshua Trees in front of the Pioneertown Gazette building, the developer shall submit and have approved by the Planning Division a relocation plan for Joshua Trees within the developed site area. The relocation plan shall be accompanied with certification from a certified arborist, registered professional forester or a Desert Native Plant Expert that the proposed tree removal, replacement, or revegetation activities are appropriate, supportive of a healthy environment, and are in compliance with Chapter 88.01 of the San Bernardino County Development Code. The certification shall include the information in compliance with Department procedures. Transplantation onsite shall be the primary method of addressing a Joshua Tree removal from the subject property

Land Use Services - Building and Safety

39 **Geotechnical Report** - Status: Outstanding
A geotechnical (soil) report shall be submitted to the Building and Safety Division for review and approval prior to issuance of grading permits or land disturbance.

Land Use Services - Land Development

40 **Additional Drainage Requirements.** - Status: Outstanding
In addition to drainage requirements stated herein, other "on-site" and/or "off-site" improvements may be required which cannot be determined from tentative plans at this time and would have to be reviewed after more complete improvement plans and profiles have been submitted to this office.

41 **Drainage Improvements** - Status: Outstanding
A Registered Civil Engineer (RCE) shall investigate and design adequate drainage improvements to intercept and conduct the off-site and on-site 100-year drainage flows around and through the site in a safe manner that will not

adversely affect adjacent or downstream properties. Submit drainage study for review and obtain approval. An $810 deposit for drainage study review will be collected upon submittal to the Land Development Division. Deposit amounts are subject to change in accordance with the latest approved fee schedule.

42 **Erosion Control Installation.** - Status: Outstanding
Erosion control devices must be installed and maintained at all perimeter openings and slopes throughout the construction of the project. No sediment is to leave the job site.

43 **FEMA Flood Zone.** - Status: Outstanding
FEMA Flood Zone. The project is located within Flood Zone D according to FEMA Panel Number 06071C8115H dated 08/28/2008. Flood hazards are undetermined in this area, but they are still possible. The requirements may change based on the recommendations of a drainage study accepted by the Land Development Division and the most current Flood Map prior to issuance of grading permit.

44 **Grading Plans** - Status: Outstanding
Grading and erosion control plans shall be prepared in accordance with the County's guidance documents (which can be found here: https://lus.sbcounty.gov/land-development-home/grading-and-erosion-control/) and submitted for review with approval obtained prior to construction. All drainage and WQMP improvements shall be shown on the grading plans according to the approved final drainage study and WQMP reports. Fees for grading plans will be collected upon submittal to the Land Development Division and are determined based on the amounts of cubic yards of cut and fill. Fee amounts are subject to change in accordance with the latest approved fee schedule.

45 **Joshua Trees.** - Status: Outstanding
Any land disturbance shall be kept at least 40 feet away from any Joshua tree in order for the design to be acceptable. If the proposed land disturbance is within 40 feet of a Joshua tree, then the applicant will need to submit a survey by a licensed arborist to verify that the proposed design will not detrimentally affect the tree. For all applications, plot plans must show the location of all Joshua trees on a parcel. http://www.sbcounty.gov/Uploads/LUS/BandS/Handouts/IB-0016.pdf

46 **On-site Flows** - Status: Outstanding
On-site flows need to be directed to the nearest County maintained road or drainage facilities unless a drainage acceptance letter is secured from the adjacent property owners and provided to Land Development.

47 **State Construction Stormwater General Permit:** - Status: Outstanding
Notice of Intent (NOI) and WDID # are required on all land disturbance of one (1) acre or more prior to issuance of a grading/construction permit. For questions regarding the State Construction Stormwater General Permit, please contact: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html

Public Health– Environmental Health Services

48 **Vector Control Requirement** - Status: Outstanding
The project area has a high probability of containing vectors. A vector survey shall be conducted to determine the need for any required control programs. A vector clearance application shall be submitted to the appropriate Mosquito & Vector Control Program. For information, contact EHS Mosquito & Vector Control Program at (800) 442-2283 or West Valley Mosquito & Vector at (909) 635-0307.

Public Works - Surveyor

49 **Corner Records Required Before Grading** - Status: Outstanding
Pursuant to Sections 8762(b) and/or 8773 of the Business and Professions Code, a Record of Survey or Corner Record shall be filed under any of the following circumstances:
a. Monuments set to mark property lines or corners;
b. Performance of a field survey to establish property boundary lines for the purposes of construction staking, establishing setback lines, writing legal descriptions, or for boundary establishment/mapping of the subject parcel;
c. Any other applicable circumstances pursuant to the Business and Professions Code that would necessitate filing of a Record of Survey.

50 **Monument Disturbed by Grading** - Status: Outstanding
If any activity on this project will disturb ANY land survey monumentation, including but not limited to vertical control points (benchmarks), said monumentation shall be located and referenced by or under the direction of a licensed land surveyor or registered civil engineer authorized to practice land surveying PRIOR to commencement of any activity with the potential to disturb said monumentation, and a corner record or record of survey of the references shall be filed with the County Surveyor pursuant to Section 8771(b) Business and Professions Code.

PRIOR TO BUILDING PERMIT ISSUANCE

Land Use Services - Planning

51 **Architecture** - Status: Outstanding
Architectural elevations are considered conceptual. Final details with colors and material samples shall be submitted to the Planning Division for approval prior to building plan check submittal.

52 **Landscape and Irrigation Plan** - Status: Outstanding
Landscape and Irrigation Plans shall be prepared in conformance with Chapter 83.10, Landscaping Standards, of the County Development Code. The developer shall submit four copies of a landscape and irrigation plan to County Planning.

53 **Issuance/Building Permit Condition** - Status: Outstanding
The existing accessory "kiosk" structure shall be moved back behind the property line facing Mane Street as shown in Exhibit A-Site Plan. If other structure is to be used as the "kiosk", then the existing accessory structure shall be removed and relocated to an allowed location or demolish and remove debris.

54 **Federal Agency Condition** - Status: Outstanding
National Park Service: The Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68, 1995) consists of four treatment standards—Preservation, Rehabilitation, Restoration, and Reconstruction—and are regulatory for NPS Grants–in–Aid programs. The Secretary of the Interior's Standards for Rehabilitation (36 CFR Part 67, 1990), which are included in the Treatment Standards, are regulatory for the Federal Historic Preservation Tax Incentives program and are the criteria used to determine if a project qualifies as "a certified rehabilitation." The Secretary of the Interior's Standards for the Treatment of Historic Properties, in particular the Standards for Rehabilitation, are intended as general guidance for work on all historic properties, are widely used, and have been adopted at the Federal, State, and local levels.

55 **Mitigation Measures** - Status: Outstanding
Please see Mitigation Monitoring and Reporting Program for mitigation measures to be completed prior to building permit issuance

County Fire - Community Safety

56 **F02 Fire Fee** - Status: Outstanding
The required fire fees shall be paid to the San Bernardino County Fire Department/Community Safety Division.

57 **F09 Building Plans** - Status: Outstanding
Building Plans shall be submitted to the Fire Department for review and approval. The required fees shall be paid at the time of plan submittal.

58 **F10 Combustible Protection** - Status: Outstanding
Prior to combustibles being placed on the project site an approved all-weather fire apparatus access surface and operable fire hydrants with acceptable fire flow shall be installed. The topcoat of asphalt does not have to be installed until final inspection and occupancy.

59 **F19 Surface** - Status: Outstanding
Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all-weather driving capabilities. Road surface shall meet the approval of the Fire Chief prior to installation. All roads shall be designed to 85% compaction and/or paving and hold the weight of Fire Apparatus at a minimum of 80K pounds.

60 **F21 Turnaround** - Status: Outstanding
An approved turnaround shall be provided at the end of each roadway one hundred and fifty (150) feet or more in length. Cul-de-sac length shall not exceed six hundred (600) feet; all roadways shall not exceed a 12 % grade and have a minimum of forty-five (45) foot radius for all turns. In the Fire Safety Overlay District cul-de-sac length shall not exceed three hundred fifty (350) feet.

61 **F22 Primary Access Paved** - Status: Outstanding
Prior to building permits being issued to any new structure, the primary access road shall be paved or an all-weather surface and shall be installed as specified in the General Requirement conditions including width, vertical clearance and turnouts.

62 **F23 Secondary Access Paved** - Status: Outstanding
Prior to building permits being issued to any new structure, the secondary access road shall be paved or an all-weather surface and shall be installed as specified in the General Requirement conditions including width, vertical clearance and turnouts.

63 **F26 Fire Flow Test** - Status: Outstanding
Please provide a fire flow test report from your water purveyor that has been completed in the last six months demonstrating that the fire flow demand is satisfied.

64 **F28 Water System Commercial** - Status: Outstanding
A water system approved and inspected by the Fire Department is required. The system shall be operational, prior to any combustibles being stored on the site. Fire hydrants shall be spaced no more than three hundred (300) feet apart

(as measured along vehicular travel-ways) and no more than three hundred (300) feet from any portion of a structure.

Land Use Services - Building and Safety

65 **Construction Plans** - Status: Outstanding
Any building, sign, or structure to be added to, altered (including change of occupancy/use), constructed, or located on site, will require professionally prepared plans based on the most current adopted County and California Building Codes, submitted for review and approval by the Building and Safety Division.

66 **Temporary Use Permit** - Status: Outstanding
A Temporary Structures (TS) permit for non-residential structures for use as office, retail, meeting, assembly, wholesale, manufacturing, and/ or storage space will be required. A Temporary Use Permit (PTUP) for the proposed structure by the Planning Division must be approved prior to the TS Permit approval. A TS permit is renewed annually and is only valid for a maximum of five (5) years.

Land Use Services - Land Development

67 **Encroachment Permits** - Status: Outstanding
Prior to installation of driveways, sidewalks, etc., an encroachment permit is required from the County Department of Public Works, Permits/Operations Support Division, Transportation Permits Section (909) 387-1863 as well as other agencies prior to work within their jurisdiction.

68 **Road Dedication/Improvements** - Status: Outstanding
Road Dedication/Improvements. The developer shall submit for review and obtain approval from the Land Use Services Department the following dedications and plans for the listed required improvements, designed by a Registered Civil Engineer (RCE) licensed in the State of California:
Pioneertown Road (Major Highway – 104 feet)
• Road Dedication. A 52-foot grant of easement is required to provide a half-width right-of-way of 52 feet.
• Driveway Approach. Design driveway approach per County Standard 129C and located per County Standard 130.
Mane Street (1/4 Section Line – No additional dedication required per Master Plan Variation)
• Road Dedication requirement removed as per approved HPTC Item 2949.

69 **Transitional Improvements** - Status: Outstanding
Right-of-way and improvements (including off-site) to transition traffic and drainage flows from proposed to existing sections shall be required as necessary.

Public Health– Environmental Health Services

70 **Demolition Inspection Required** - Status: Outstanding
All demolition of structures shall have a vector inspection prior to the issuance of any permits pertaining to demolition or destruction of any premises. For information, contact EHS Mosquito & Vector Control Program at (800) 442-2283 or West Valley Mosquito & Vector at (909) 635-0307.

71 **Existing OWTS** - Status: Outstanding
Existing onsite wastewater treatment system can be used if applicant provides an EHS approved certification that indicates the system functions properly, meets code, has the capacity required for the proposed project, and meets LAMP requirements.

72 **Existing Wells** - Status: Outstanding
If wells are found on-site, evidence shall be provided that all wells are:
(1) properly destroyed, by an approved C57 contractor and under permit from the County; or
(2) constructed to EHS standards, properly sealed and certified as inactive; or
(3) constructed to EHS standards and meet the quality standards for the proposed use of the water (industrial and/or domestic). Evidence, such as a well certification, shall be submitted to EHS for approval.

73 **Food Establishment Plan Check Required** - Status: Outstanding
Plans for food establishments shall be reviewed and approved by EHS. For information, call EHS Plan Check at: (800) 442-2283.

74 **New OWTS** - Status: Outstanding
If sewer connection and/or service are unavailable, onsite wastewater treatment system(s) may then be allowed under the following conditions: a. A soil percolation report shall be submitted to EHS for review and approval. For information, please contact the Wastewater Section at (800) 442-2283. b. An Alternative Treatment System, if applicable, shall be required.

75 **Preliminary Acoustical Information** - Status: Outstanding
Submit preliminary acoustical information demonstrating that the proposed project maintains noise levels at or below San Bernardino County Noise Standard(s), San Bernardino Development Code Section 83.01.080. The purpose is to evaluate potential future on-site and/or adjacent off-site noise sources. If the preliminary information cannot demonstrate compliance to noise standards, a project specific acoustical analysis shall be required. Submit information/analysis to the EHS for review and approval. For information and acoustical checklist, contact EHS at (800) 442-2283.

76 **Sewage Disposal** - Status: Outstanding
Method of sewage disposal shall be sewer service provided by an EHS approved onsite wastewater treatment system (OWTS) that conforms to the Local Agency Management Program (LAMP).

77 **Water Purveyor** - Status: Outstanding
Water purveyor shall be CSA 70.

78 **Water Service Verification Letter** - Status: Outstanding
Applicant shall procure a verification letter from the water service provider. This letter shall state whether or not water connection and service shall be made available to the project by the water provider. This letter shall reference the File Index Number and Assessor's Parcel Number(s). For projects with current active water connections, a copy of water bill with project address may suffice.

Public Works - Solid Waste Management

79 **Construction Waste Management Plan (CWMP) Part 1** - Status: Outstanding
The developer shall prepare, submit, and obtain approval from SWMD of a CDWMP Part 1 for each phase of the project. The CWMP shall list the types and weights of solid waste materials expected to be generated from construction. The CWMP shall include options to divert waste materials from landfill disposal, materials for reuse or recycling by a minimum of 65% of total weight or volume. More information can be found on the San Bernardino County Solid Waste Management Division (SWMD) website at https://dpw.sbcounty.gov/solid-waste-management/construction-waste-management/. An approved CDWMP Part 1 is required before a permit can be issued. There is a one-time fee of $150.00 for residential projects/$530.00 for commercial/non-residential projects

PRIOR TO FINAL INSPECTION

County Fire - Community Safety

80 **F24 Fire Lanes** - Status: Outstanding
The applicant shall submit a fire lane plan with the building construction plans to the Fire Department for review and
approval. Fire lane curbs shall be painted red. "No Parking, Fire Lane" signs shall be installed on public/private roads in accordance with the approved plan.

81 **F25 Street Sign** - Status: Outstanding
This project is required to have an approved street sign (temporary or permanent). The street sign shall be installed on the nearest street corner to the project. Installation of the temporary sign shall be prior any combustible material being placed on the construction site. Prior to final inspection and occupancy of the first structure, the permanent street sign shall be installed.

82 **F35 Hydrant Marking** - Status: Outstanding
Blue reflective pavement markers indicating fire hydrant locations shall be installed as specified by the Fire Department. In areas where snow removal occurs, or non-paved roads exist, the blue reflective hydrant marker shall be posted on an approved post along the side of the road, no more than three (3) feet from the hydrant and at least six (6) feet high above the adjacent road.

83 **F37 Fire Sprinkler-NFPA #13** - Status: Outstanding
An automatic fire sprinkler system complying with NFPA Pamphlet #13 and Fire Department standards is required. The applicant shall hire a licensed fire sprinkler contractor. The fire sprinkler contractor shall submit plans with hydraulic calculations, manufacturers specification sheets and a letter from a licensed structural (or truss) engineer with a stamp verifying the roof is capable of accepting the point loads imposed on the building by the fire sprinkler system design to the Fire Department for approval. The contractor shall submit plans showing type of storage and use with the applicable protection system. The required fees shall be paid at the time of plan submittal.

84 **F41 Fire Alarm** - Status: Outstanding
A manual, automatic or manual and automatic fire alarm system complying with the California Fire Code, NFPA and all applicable codes is required. The applicant shall hire a licensed fire alarm contractor. The fire alarm contractor shall submit detailed plans to the Fire Department for review and approval. The required fees shall be paid at the time of plan submittal.

85 **F45 Fire Extinguishers** - Status: Outstanding
Hand portable fire extinguishers are required. The location, type, and cabinet design shall be approved by the Fire Department.

86 **F46 Hood and Duct Suppression** - Status: Outstanding
An automatic hood and duct fire extinguishing system is required. The applicant shall hire a licensed fire protection contractor to submit detailed plans with manufactures' specification sheets to the Fire Department for review and approval. The required fees shall be paid at the time of plan submittal.

87 **F51 Commercial Addressing** - Status: Outstanding
Commercial and industrial developments of 100,000 sq. ft or less shall have the street address installed on the building with numbers that are a minimum eight (8) inches in height and with a one (1) inch stroke. The street address shall be visible from the street. During the hours of darkness, the numbers shall be electrically illuminated

(internal or external). Where the building is two hundred (200) feet or more from the roadway, additional non-illuminated address identification shall be displayed on a monument, sign or other approved means with numbers that are a minimum of six (6) inches in height and three-quarter (¾) inch stroke.

88 **F55 Key Box** - Status: Outstanding
An approved Fire Department key box is required. In commercial, industrial and multi-family complexes, all swing gates shall have an approved fire department Lock (Knox ®).

PRIOR TO OCCUPANCY

Land Use Services - Planning

89 **Off-Site Parking Plan and Agreement** - Status: Outstanding
Prior to occupancy, the applicant shall obtain approval of a Site Plan Permit, in compliance with Chapter 85.08 of the Development Code, for an off-site parking facility providing the 63 required parking spaces not provided on the Project site, consistent with Development Code Section 83.11.030(a). The applicant shall also provide an executed and recorded parking agreement, in a form approved by the Department, in consultation with County Counsel, demonstrating the Project's continuing legal right to use the required off-site parking spaces and ensuring that such spaces remain permanently available and maintained for the Project in accordance with Section 83.11.030(e). The off-site parking shall be developed, maintained, and used in accordance with the approved Site Plan Permit and parking agreement.

90 **Installation of Improvements** - Status: Outstanding
All required on-site improvements, including landscaping, irrigation, and structures, shall be installed per approved plans.

91 **Mitigation Measures** - Status: Outstanding
Please see Mitigation Monitoring and Reporting Program for mitigation measures to be completed prior to occupancy permit issuance

92 **Screen Rooftop** - Status: Outstanding
All roof top mechanical equipment is to be screened from ground vistas.

93 **Shield Lights** - Status: Outstanding
Any lights used to illuminate the site shall include appropriate fixture lamp types as listed in SBCC Table 83-7 and be hooded and designed so as to reflect away from adjoining properties and public thoroughfares and in compliance with SBCC Chapter 83.07, "Glare and Outdoor Lighting" (i.e. "Dark Sky Ordinance).

94 **Condition Compliance** - Status: Outstanding
Prior to occupancy/use, all conditions shall be completed to the satisfaction of County Planning with appropriate authorizing approvals from each reviewing agency.

County Fire - Community Safety

95 **F06 Inspection by Fire Department** - Status: Outstanding
Permission to occupy or use the building (Certification of Occupancy or Shell Release) will not be granted until the Fire Department inspects, approves and signs off on the Building and Safety job card for "fire final".

Land Use Services - Building and Safety

96 **Condition Compliance Release Form Sign-off** - Status: Outstanding
Prior to occupancy all Department/Division requirements and sign-offs shall be completed.

Land Use Services - Land Development

97 **Drainage Improvements** - Status: Outstanding
All required drainage improvements shall be completed by the applicant. The private Registered Civil Engineer (RCE) shall inspect improvements outside the County right-of-way and certify that these improvements have been completed according to the approved plans. Certification letter shall be submitted to Land Development.

98 **LDD Requirements** - Status: Outstanding
All LDD requirements shall be completed by the applicant prior to occupancy.

Public Health– Environmental Health Services

99 **New Alternative Treatment System Permit** - Status: Outstanding
An Alternative Treatment System annual permit shall be required. For information, contact EHS at: (800) 442-2283.

100 **New Retail Food Facility Permit** - Status: Outstanding
A Retail Food Facility annual permit for food facility shall be required. For information, contact EHS at: (800) 442-2283.

Public Works - Solid Waste Management

100 **Construction Waste Management Plan (CDWMP) Part 2** - Status: Outstanding
The developer shall complete SWMD's CDWMP Part 2 for construction and demolition. The CDWMP Part 2 shall provide evidence to the satisfaction of SWMD that demonstrates that the project has diverted from landfill disposal, material for reuse or recycling by a minimum of 65% of total weight or volume of all construction waste. The developer MUST provide ALL receipts and/or backup documentation for actual disposal/diversion of project waste. More information can be found on the San Bernardino County Solid Waste Management Division (SWMD) website at https://dpw.sbcounty.gov/solid-waste-management/construction-waste-management/.

County Fire - Community Safety

101 **F16 Access** - Status: Outstanding
The development shall have a minimum of ____2____ points of vehicular access. These are for fire/emergency equipment access and for evacuation routes. a. Single Story Road Access Width. All buildings shall have access provided by approved roads, alleys and private drives with a minimum twenty-six (26) foot unobstructed width and vertically to fourteen (14) feet six (6) inches in height. b. Multi-Story Road Access Width. Fire apparatus access roadways serving buildings that are three (3) or more stories or thirty (30) feet or more in height shall be a minimum of thirty (30) feet in unobstructed width and vertically to fourteen (14) feet six (6) inches in height.

If you would like additional information regarding any of the conditions in this document, please contact the department responsible for applying the condition and be prepared to provide the Record number above for reference. Department contact information has been provided below.

Department/Agency	**Office/Division**	**Phone Number**
Land Use Services Dept.	San Bernardino Govt. Center	(909) 387-8311
(All Divisions)	High Desert Govt. Center	(760) 995-8140
Web Site	https://lus.sbcounty.gov/	
County Fire	San Bernardino Govt. Center	(909) 387-8400
(Community Safety)	High Desert Govt. Center	(760) 995-8190
Web Site	https://www.sbcfire.org/	
County Fire	Hazardous Materials	(909) 386-8401
	Flood Control	(909) 387-7995
Dept. of Public Works	Solid Waste Management	(909) 386-8701
	Surveyor	(909) 387-8149
	Traffic	(909) 387-8186
Web Site	https://dpw.sbcounty.gov/	
Dept. of Public Health	Environmental Health Services	(800) 442-2283
Web Site	https://ehs.sbcounty.gov	
Local Agency Formation Commission (LAFCO)		(909) 388-0480
Web Site	http://www.sbclafco.org/	
	Water and Sanitation	(760) 955-9885
	Administration,	
	Park and Recreation,	
Special Districts	Roads, Streetlights,	(909) 386-8800
	Television Districts, and Other	
External Agencies (Caltrans, U.S. Army, etc.)		*See condition text for contact information...*

EXHIBIT D

INITIAL STUDY

FOR THE

PIONEERTOWN SOUNDSTAGE PROJECT – PROJ-2022-00191

Prepared for:

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

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February 2026

TABLE OF CONTENTS

Introduction 1

Environmental Factors Potentially Affected 16

Determination 17

Evaluation of Environmental Impacts 18
I. Aesthetics 20
II. Agricultural and Forestry Resources 28
III. Air Quality 31
IV. Biological Resources 43
V. Cultural Resources 55
VI. Energy 62
VII. Geology and Soils 66
VIII. Greenhouse Gas Emissions 75
IX. Hazards and Hazardous Materials 80
X. Hydrology and Water Quality 88
XI. Land Use and Planning 99
XII. Mineral Resources 102
XIII. Noise 104
XIV. Population and Housing 116
XV. Public Services 118
XVI. Recreation 121
XVII. Transportation / Traffic 122
XVIII. Tribal Cultural Resources 129
XIX. Utilities and Service Systems 131
XX. Wildfire 137
XXI. Mandatory Findings of Significance 140

Summary of Mitigation Measures 143

References 150

Appendices

Appendix 1 — Air Quality and Greenhouse Gas Analysis
Appendix 2 — Biological Resources Assessment
Appendix 3a — Cultural Resources Assessment
Appendix 3b — Historical Building Study
Appendix 4 — Preliminary Hydrology
Appendix 5 — Noise Study
Appendix 6 — Traffic Screening

Figures

Figure 1 Regional Map 13
Figure 2 Site Location Map 14
Figure 3 Site Plan 15

Figure I-1 Scenic Highway Map 27

Figure II-1 Agricultural Resources Map 30

Figure IV-1 Biotic Resources Map 53
Figure IV-2 Vegetation Map 54

Figure VII-1 Earthquake Zones of Requires Investigation 71
Figure VII-2 Earthquake Fault Zones Map 72
Figure VII-3 Subsidence Map 73
Figure VII-4 Paleontology Map 74

Figure IX-1 GeoTracker 84
Figure IX-2 Airport Safety Map 85
Figure IX-3 Evacuation Route Map 86
Figure IX-4 Fire Hazard Severity Zone Map 87

Figure X-1 Preliminary Hydrology Map 96
Figure X-2 National Flood Hazard Layer FIRMette 97
Figure X-3 Flood Hazard Map 98

Figure XII-1 Mineral Resource Zones 103

Figure XIII-1 Existing Noise Contours Map 114
Figure XIII-2 Future Noise Contours Map 115

Figure XVII-1 Bicycle and Pedestrian Planning Map 127
Figure XVII-2 Project Trip Distribution 128

Tables

Table 1 Existing Land Uses and Land Use Zoning Districts 1

Table III-1 Maximum Daily Regional Emissions Thresholds 33
Table III-2 Construction Duration 37
Table III-3 Construction Equipment 38
Table III-4 Regional Construction Emissions Summary 38
Table III-5 Operational Emissions from Existing Development 39
Table III-6 Total Project Regional Operational Emissions 40

Table IV-1 Western Joshua Tree Mitigation 45

Table VIII-1 Operational Emissions From Existing Development 77
Table VIII-2 Total Project GHG Emissions 78

Table XIII-1 Noise Standards for Stationary Noise Sources 105
Table XIII-2 Short-Term Noise Measurement Data (dBA) 107
Table XIII-3 Typical Construction Noise Levels 108
Table XIII-4 Worst-case Predicted Operational Leq Noise Level 109
Table XIII-5 Typical Vibration Levels 111

Table XVII-1 Project Trip Generation 124

Exhibits

Exhibit XIII-1 Measurement Location 107
Exhibit XIII-2 Noise Contours 110

Photos

Photo 1 From the northwest corner of the project site looking south along the western boundary. 7
Photo 2 From the northwest corner of the project site looking east along the northern boundary 8
Photo 3 From the northeast corner of the project site looking west along the northern boundary 8
Photo 4 From the northeast corner of the project site looking south along the eastern boundary. 9
Photo 5 From the southeast corner of the project site looking north along the eastern boundary 9
Photo 6 From the southeast corner of the project site looking west along the southern boundary 10
Photo 7 From the southwest corner of the project site looking east along the southern boundary 10
Photo 8 From the southwest corner of the project site looking north along the western boundary 11
Photo 9 From the southern boundary of the project site looking north at the entrance sign. 11

List of Abbreviations and Acronyms

°F	Fahrenheit
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AF	acre feet

AF	Acre Feet
AFY	acre feet per year
AKA	also known as
amsl	above mean sea level
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	Air Resources Board
BACMs	Best Available Control Measures
bgs	belowground surface
BMPs	Best Management Practices
BRA	Biological Resources Assessment
C&D	construction and demolition
C_2Cl_4	perchloroethylene
C_2H_4O	acetaldehyde
C_4H_6	1,3-butadiene
C_6H_6	benzene
CAA	Clean Air Act
CAAA	Clean Air Act Amendment
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBMWD	Central Basin Municipal Water District
CCAR	California Climate Action Registry
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_2O	formaldehyde
CH_4	methane
CHRIS	California Historical Resources Information System
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	carbon dioxide
COA	Conditions of Approval

COCs	constituents of concern
Corps	U.S. Army Corps of Engineers
CRHR	California Register of Historical Resources
CRMP	Cultural Resource Management Plan
CWA	Clean Water Act
CY	cubic yard
dB	decibel
dBA	A-weighted decibel
DDW	Division of Drinking Water
DPM	diesel particulate matter
DTSC	Department of Toxic Substance Control
DWR	Department of Water Resources
EIR	Environmental Impact Report
EO	Executive Orders
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FGC	Fish & Game Code
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Maps
FT	Federal Threatened
FTA	Federal Transit Association
GCC	Global Climate Change
GHG	Greenhouse Gas
gpm	gallons per minute
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
HCP	Habitat Conservation Plan
HFCs	hydrofluorocarbons
hP	horse power
HSC	Health and Safety Code
in/sec	inches per second
km	kilometers
kWh	kilowatt hour
lbs./day	Pounds Per Day
Leq	equivalent continuous sound level
LF	lineal feet
LRA	Local Responsibility Area
LSA	Lake or Streambed Alteration

LST	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCL	maximum contamination level
MLD	Most Likely Descendant
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MT	Metric Ton
$MTCO_2e/yr$	Metric Tons of CO_2 equivalent per year
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NBP	Nesting Bird Plan
NCCP	Natural Community Conservation Plan
No.	Number
NO_2 or NO_x	Nitrogen Dioxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resource Conservation Service
NWI	National Wetlands Inventory
O_3	Ozone
OPR	Office of Planning and Research
Pb	Lead
PFCs	perfluorocarbons
PM 10	Fine Particulate Matter
PM 2.5	Fine Particulate Matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resource Code
R	Refrigerants
ROG	reactive organic gases
ROW	Rights-of-Way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RW	Recycled water
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center

SCE	Southern California Edison
SEAs	Significant Ecological Areas
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SGMP	Sustainable Groundwater Management Plan
SO2	Sulfur Dioxide
SOI	Secretary of Interior
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resources
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VdB	vibration-velocity decibel
VMT	vehicle miles traveled
VOCs	Volatile Organic Compounds
vph	vehicles per hour
WOTUS	Waters of the United States
WQMP	Water Quality Management Plan

SAN BERNARDINO COUNTY PROJECT DESCRIPTION

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to San Bernardino County (County) Guidelines under Ordinance 3040 and Section 15063 of the California Environmental Quality Act (CEQA) Guidelines.

Project Summary Table

APNs:	0594-391-06, -07, and -08	***USGS Quad:***	Yucca Valley North, CA
Applicant:	Pioneertown Land Company, LLC Mr. David Corso Managing Member 72135 Woburn Court Thousand Palms, CA 92276	***T, R, Section:***	Section 26 of Township 2 North, Range 4 East
Location:	The proposed project is located at 53585 Mane Street, Pioneertown, CA 92268. The Pioneertown Soundstage is located along Pioneertown Road in the unincorporated community of Pioneertown, San Bernardino County, CA. The approximate GPS coordinates of the project site are 34.156600º, -116.495457º.	***Thomas Bros:***	N/A
Project No:	PROJ-2022-00191	***Community Plan:***	Pioneertown Community Plan
Rep:	Transtech David Mlynarski david.mlynarski@transtech.org 13367 Benson Avenue Chino, California 91710	***LUZD:***	Countywide Plan: Commercial (C) Zoning: Rural Commercial Zoning District: Special Development-Residential (SD-RES)
Proposal:	Development of a Soundstage, Ice Creamery/Coffee Shop, and Outdoor Dining Area in Pioneertown, which requires a Conditional Use Permit.	***Overlays:***	Biotic Resources for Desert Tortoise (Sparse Population)

Project Contact Information

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

Lead Agency Contact person: Luis Rodriguez, Jr. Contract Planner III
Phone No: 909-387-4600
E-mail: Luis.Rodriguez@lus.sbcounty.gov

Project Description

Existing Site Conditions

The proposed project site is located in the unincorporated community of Pioneertown within the Desert Region of San Bernardino County, California. Pioneertown is a rural community located east of the San Bernardino Mountains and regionally set in the Morongo Basin region of the Mojave Desert. **Figures 1 and 2** provide a regional and local context, respectively, of the project location.

Land in the vicinity of the project site supports a mosaic of developed and undeveloped land, with developed land dominated by residential and commercial parcels and undeveloped land supporting a mixture of natural plant communities and disturbed/modified landscapes. Pioneertown was established in 1946 as a wild-west themed community that was developed as a shooting location for Western films and television series, and Mane Street Historic District is listed on the National Register of Historic Places. The project site is bounded on the north by Mane Street with commercial development found farther north; on the east by commercial development; on the south by Pioneertown Road with undeveloped, vacant land and residential development farther south; and on the west by commercial development.

The project site itself primarily supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette, and several retail establishments with associated infrastructure and unpaved parking areas. The project site also supports narrow swaths of undeveloped land that are periodically cleared of vegetation in association with routine weed abatement activities and associated infrastructure maintenance.

The San Bernardino County Countywide Plan Land Use designation is Commercial (C), while the Zoning classification is Rural Commercial, while the Land Use Zoning District is Special Development-Residential (SD-RES). The land uses and zoning districts bordering the project site are outlined in Table 1 below:

Table 1: EXISTING LAND USE AND LAND USE ZONING DISTRICTS

Location	Existing Land Use	Land Use Category	Zoning District
Project Site	Existing Soundstage	Commercial	Special Development-Residential (SD-RES); Rural Commercial
North	Pioneertown commercial shops and Camp Pioneertown	Commercial	Special Development-Residential (SD-RES)
South	Single Family Residences	Rural Living	Special Development-Residential (SD-RES)
East	Pioneer Bowl	Commercial	Special Development-Residential (SD-RES))
West	The Red Dog Saloon and associated parking	Commercial	Special Development-Residential (SD-RES)

Project Overview

The Applicant proposes to improve an existing 1.84-acre, multi-use commercial site serving the Pioneertown area in unincorporated San Bernardino County (refer to **Figure 3**). The main proposed uses are as follows:

The Pioneertown Soundstage

- The Pioneertown Soundstage (6,223 square feet [SF]) would be renovated to facilitate musical programming that residents and visitors of Pioneertown would expect, such as cowboy karaoke, line dancing, and country rock performances, in addition to more varied programming like vinyl listening sessions and current popular music options.
- The interior of Soundstage will be a flexible open area in the middle with permanent seating on the interior perimeter. The enclosed outdoor patio area associated with the Soundstage would be 3,258 SF.
- The renovation would keep the Soundstage as a community resource, as it hosts fundraisers for local organizations, such as the San Bernardino County Sheriff's Department and California Highway Patrol (CHP) Holiday Party, Joshua Tree National Park Association, and local residential uses such as Pioneertown Holiday Potluck and various celebration of life events for residents.
- The Soundstage would continue to be a venue available to rent for weddings and events on evenings when programming is not scheduled.
- The existing historical wood block signs associated with the Pioneertown Soundstage will be retained.

The Pioneertown Gazette-Cowboy Coffee & Creamery

- The goal is to turn the dilapidated former local newspaper building into an all-day café for the community and visitors of Pioneertown. The Pioneertown Gazette-Cowboy Coffee & Creamery (831 SF) would serve coffee and espresso in the morning along with light breakfast snacks, transitioning into family friendly snacks and ice creamery serving community and visitors needs later in the day. The business will provide a respite from the heat and cold. The Pioneertown Gazette will include the original Pioneertown Gazette sign that was restored by a legendary craftsman consistent with that which exists throughout Pioneertown.

Outdoor Dining/Gathering Pavilion-The Hitching Post

- The Outdoor Dining/Gathering Pavilion (3,024 SF) would serve as a central gathering place between the Pioneertown Soundstage and Gazette, with shade and ample seating for guests at either establishment or visitors/residents of the town to gather while enjoying food, music, or Pioneertown's vistas and climate. The outdoor patio area will have non-fixed picnic tables.

As part of this project, the Pioneertown Soundstage and Pioneertown Gazette would be sensitively restored to a Western look in the vein of what currently exists in Pioneertown to retain the unique historical character of the area.

Additional modular structures are proposed to serve as public restrooms, mobile snack cart, and a self-contained mobile kitchen (225 SF). These features are shown on the site plan provided on **Figure 3**. The Soundstage remodel includes new Americans with Disabilities Act (ADA) restrooms, ADA parking, bar area, and lounge. Parking will primarily be installed on the southern portion of the site, with ADA parking installed adjacent to the Soundstage. Additionally, a new wood deck (that will be 1,831 SF in size) will be installed along the project's northern frontage, which will provide for ADA accessible entrances to each of the three proposed uses (Pioneertown Soundstage, Pioneertown Gazette, and Outdoor Dining/Gathering Pavilion).

Site Layout and Access

Access to the site will occur through the installation of two new driveways; each will only serve as exit or entry only, along Pioneertown Road. The driveway entrance will utilize gravel to provide a compacted gravel access road and driveway in accordance with the fire department standards. The proposed project is anticipated to retain existing native plants/landscaping onsite. Landscaped areas on site will be 13,033 SF, while paved areas on site would be 2,029 SF per County landscaping standards. The parking and drive aisles will be compacted native soil at 21,934 SF. The project will also remove the existing wood fence and install a new wood fence along the southern property line. Additionally, the fenced area behind the Soundstage will remain an open area on native soil at 3,266 SF.

Pedestrian access to the site will occur from the wood deck located along Mane Street to the Pioneertown Gazette and project site as a whole. The wood deck would connect to a concrete walkway at the northeast corner of the project site along Main Street and will allow pedestrians to continue to the Pioneertown Soundstage and parking lot.

Parking

The parking onsite includes 50 automobile parking spaces, which includes 5 accessible (American Disabilities Act [ADA]) parking spaces that would be paved, and 1 loading space. While no EV charging stations are planned at this time, the developer is open to providing space for such installation if feasible. Other than the accessible parking spaces, the parking lot will remain unpaved compacted native soil at 21,934 SF. The accessible parking spaces will also be accompanied by a concrete walkway totaling 710 SF.

Utility Connections

- Power: Southern California Edison (SCE). The project includes the installation of a new electrical panel, which is required to bring the project into compliance with the County Building and Fire codes.
- Water: San Bernardino County Department of Public Works Special Districts Water (District) and Sanitation Division
- Internet:
    - Soundstage: Flashbyte
    - Gazette: No internet proposed at this time
- Wastewater: Existing septic tank at Soundstage and Pioneertown Gazette to be removed and replaced with environmentally upgraded septic system (one septic tank that includes three leach lines). This system would be both more efficient than the existing system at processing septic waste, and further, would be developed to prevent septic leeching into the underlying soils or groundwater table.
- Trash/Waste Disposal: Burrtec

Construction Scenario

Project construction will begin with clearing and grubbing the site. No grading is proposed at this time, as no new habitable structures would be installed. Minor clearing and grubbing activity beyond that which has already taken place as part of site maintenance will consist of removing the vegetation from the areas that will eventually support the features of the project shown on **Figure 3**. An estimated 10 workers will complete this phase of site preparation over a period of about 7 weeks. A paver will be necessary for up to 7 days of construction during this period to install the pavement supporting the ADA parking spaces.

The standard parking area will be surface graded, and the entryway access road will be compacted and covered with gravel. If fugitive dust is observed, the remainder of the access road and parking will be covered with compacted gravel, sprayed with water, or the Applicant will utilize other means of dust minimization. This is required to manage fugitive dust as a result of the fine particulate matter (PM-10) non-attainment status of the Mojave Desert Air Basin (MDAB) area, which therefore requires that Best Available Control Measures (BACMs) be used to comply with the Mojave Desert Air Quality Management District (MDAQMD) Rule 403.

In addition to the clearing and grubbing described above, site development will include the removal of an existing septic tank and the installation of a new septic tank to meet County requirements for onsite wastewater management (County Development Code Section 33.08105, Minimum Requirements). The septic tank must be abandoned (abated) by either removing the tank entirely or backfilling it with an approved material in accordance with the County Code of Ordinances Section 33.0879. Excavation will be required in support of the septic system at its location north of the restrooms, as shown on the site plan (**Figure 3**), with an excavation depth of no greater than 10 feet. Onsite utilities, such as septic lines, water connections, and electrical connections will be installed through trenching to serve the proposed site uses. Construction equipment is expected to be utilized for the above activities includes a small tractor, a small trencher, backhoe, tractor, trencher, and bobcat.

Delivery of construction supplies and removal of any excavated materials, if necessary, will be accomplished using trucks during normal working hours (between 7:00 a.m. and 7:00 p.m. daily, except Sundays and Federal holidays County Development Code Section § 83.01.080(g) Exempt Noise), with a maximum of 45 round trips per day. It is anticipated that 10-15 employees will be required to support the construction of the project each day.

Construction materials are typical of most commercial building projects. The materials will include lumber, metals, PVC piping, conduit/copper wiring.

Construction timing: Design and construction of the project is anticipated to begin in June of 2026 completed by August of 2027. However, the Air Quality Impact Analysis utilized October 2025 through December 2026 for modeling purposes. The construction schedule utilized in this analysis for air quality modeling, purposes, for instance, represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.

Operational Scenario

Pioneertown Soundstage
The Pioneer Soundstage will operate within the following parameters:

- Monday-Sunday from 11am to 10pm
- Monday/Tuesday closed except during holidays and events.
- Friday, Saturday, Sunday 11am to 2am

Note that events held at the Pioneertown Soundstage would be permitted under its proposed Conditional Use Permit (CUP). The Noise Study prepared for the proposed project (**Appendix 5**) was prepared to verify that the operational hours of the Pioneertown Soundstage would meet the County Development Code

for daytime and nighttime noise limits. The predicted operational noise for the project is presented in Subsection XII, Noise.

*** Please note that if there was no event buyout or entertainment planned Soundstage may close much earlier than the above hours ***

The Pioneertown Soundstage is anticipated to employ 8 full-time employees, with up to 30 part-time employees anticipated to serve its operations during events. The maximum permitted occupancy for the Pioneertown Soundstage is 500 persons considering both the inside and outside patios.

Pioneertown Gazette
The Pioneertown Gazette will operate within the following parameters:

- Sunday, Monday, Wednesday, Thursday from 7am to 3pm for breakfast and lunch.
- Closed Tuesday and Wednesday
- Friday, Saturday, Sunday 7am to 5pm

The Pioneertown Gazette is anticipated to employ 2 full-time employees, with up to 10 part-time employees anticipated to serve its operations during the high season. The occupancy for the Pioneertown Gazette is 25 persons.

Outdoor Dining/Gathering Pavilion
The Outdoor Dining/Gathering Pavilion will operate within the following parameters:

- Wednesday to Thursday from 7am to 6pm for breakfast and lunch, snacks, coffee, and ice cream for purchase from on-site snack carts, the mobile kitchen, or the Pioneertown Gazette.
- Closed Monday/Tuesday
- Friday to Sunday 7am to 8pm

The occupancy for the Outdoor Dining/Gathering Pavilion would be 50 persons.

Application with the County

The Applicant requires a Conditional Use Permit (CUP) from the County to construct the Pioneertown Soundstage Project as described throughout this project description.

Project Site Photos



Photo 1: From the northwest corner of the project site looking south along the western boundary.



Photo 2: From the northwest corner of the project site looking east along the northern boundary



Photo 3: From the northeast corner of the project site looking west along the northern boundary.



Photo 4: From the northeast corner of the project site looking south along the eastern boundary.



Photo 5: From the southeast corner of the project site looking north along the eastern boundary.



Photo 6: From the southeast corner of the project site looking west along the southern boundary.



Photo 7: From the southwest corner of the project site looking east along the southern boundary.



Photo 8: From the southwest corner of the project site looking north along the western boundary.



Photo 9: From the southern boundary of the project site looking north at the entrance sign.

Additional Approvals that may be Required by Other Public Agencies

(Example: permits, financing approvals or participation agreements.)

- San Bernardino County Fire Department: Project Approval
- The U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) may need to be consulted regarding threatened and endangered species documented to occur within an area of potential impact for future individual projects. This could include consultations under the Fish and Wildlife Coordination Act.
- No other permits are known to be required at this location because the project would not result in the disturbance of more than one acre of soil/land during construction. Thus, no Storm Water Pollution Prevention Plan (SWPPP) or Water Quality Management Plan (WQMP) are required.

Summary of Consultation with California Native American Tribes

The County has been contacted by several Tribes under Assembly Bill (AB) 52 requesting to be consulted on applicable projects within the County. The Tribes with a historical presence in the Pioneertown area were contacted by the County through mailed letters to initiate the AB 52 process on December 6, 2023. These Tribes are: Soboba Band of Mission Indians, Yuhaaviatam of San Manuel Nation, Morongo Band of Mission Indians, Fort Mojave Indian Tribe, and the Twenty-Nine Palms Band of Mission Indians. During the 30-day consultation period, the County received a response from only one Tribe—the Twenty-Nine Palms Band of Mission Indians—which indicated that the project is outside of the known Chemehuevi Traditional Use Area. As a result, consultation under AB 52 was not requested. Therefore, consultation has concluded with no request from any Tribe to be included as a consulting party for this project.

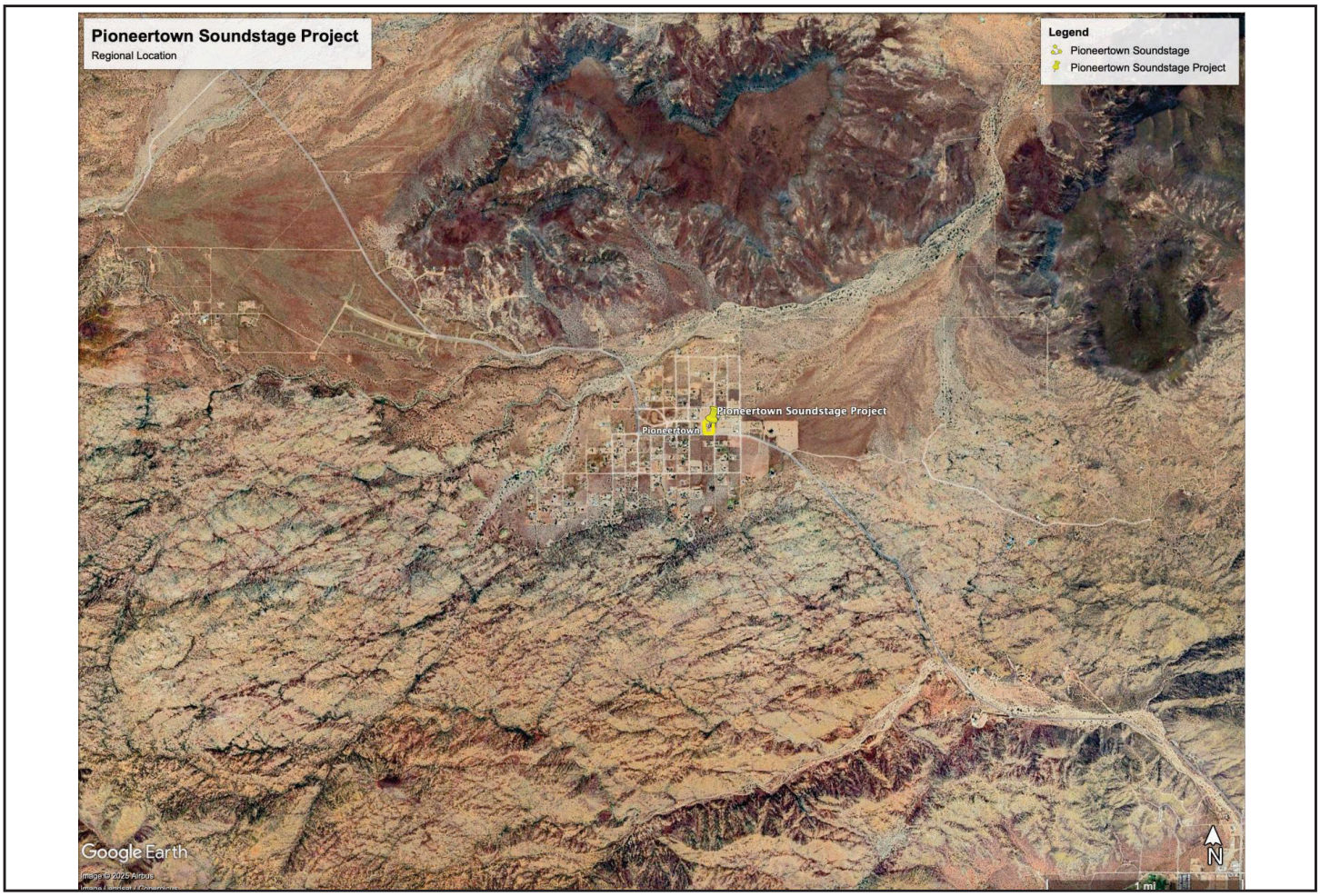


FIGURE 1

Tom Dodson & Associates
Environmental Consultants

Regional Map

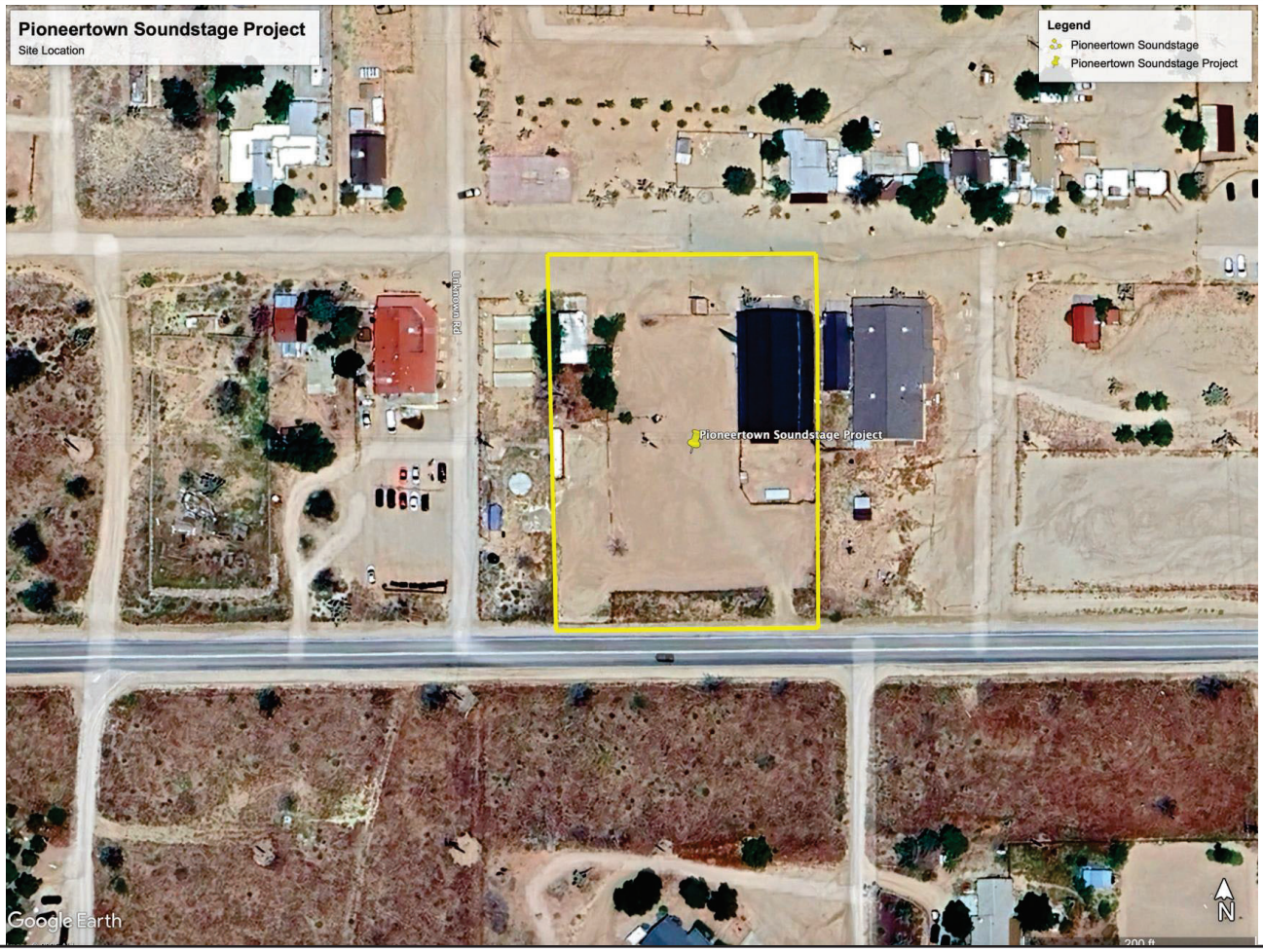


FIGURE 2

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Site Location Map

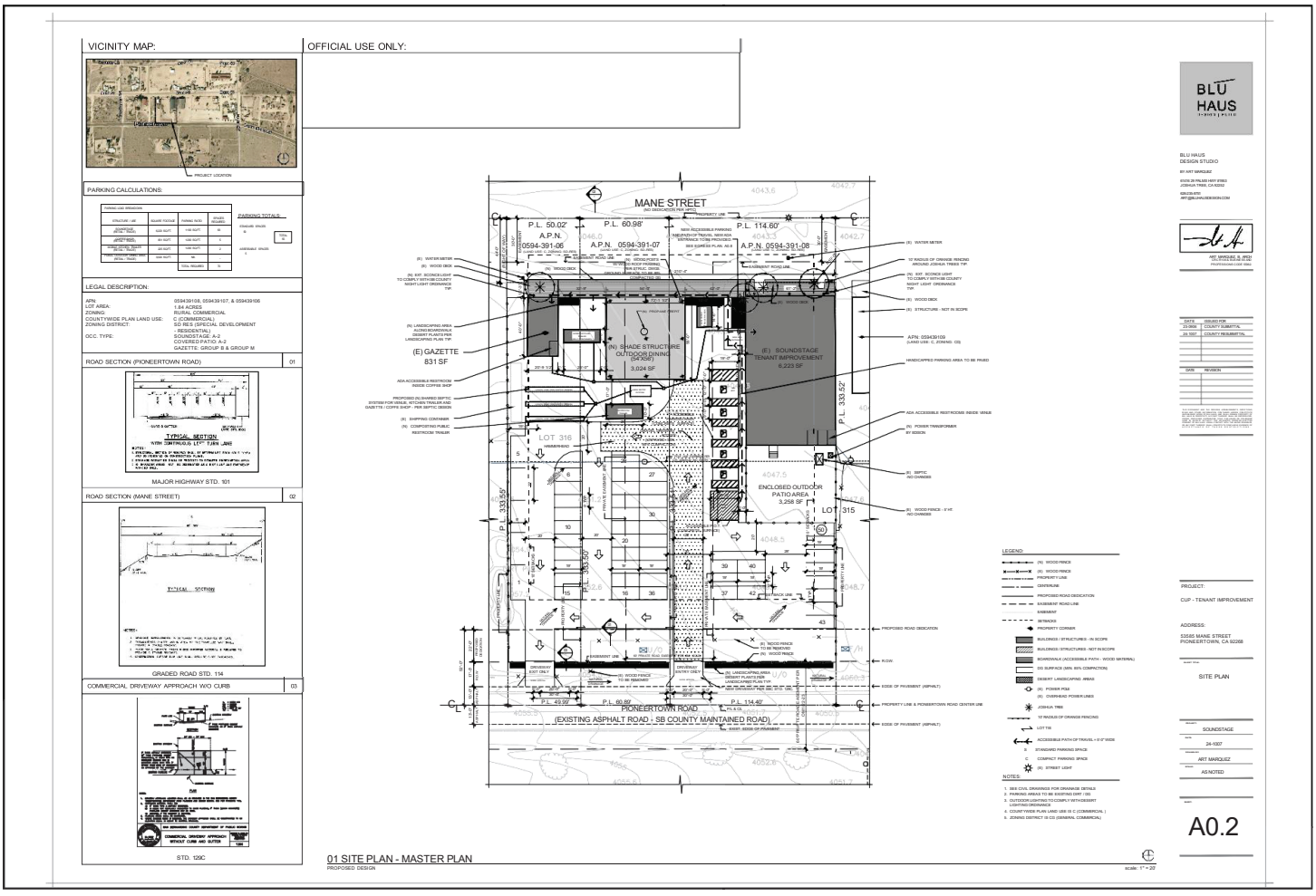


FIGURE 3

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Site Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☒ Hydrology & Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☒ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☒ Transportation	☐ Tribal Cultural Resources
☒ Utilities / Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

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.
☒	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.

Prepared by: Luis Rodriguez, Contract Planner — Date: 2/11/2026

Approved by: Paul Toomey, Supervising Planner — Date: 2/11/2026

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., Countywide Plans, zoning ordinances). Reference to a

previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

I. AESTHETICS

SUBSTANTIATION: (Check ☒ if project is located within the view-shed of any Scenic Route listed in the Countywide Plan)

Impact Analysis

a. *Less Than Significant Impact* – Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas, such as resources and focal views of such resources, that would be altered by new development. The project site primarily supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette and several retail establishments with associated infrastructure and unpaved parking areas and also supports narrow swaths of undeveloped land that are periodically cleared of vegetation in association with routine weed abatement activities and infrastructure maintenance. A review of the project area determined that there are no natural scenic vistas located internally within the area proposed for the development of the project site. The San Bernardino Countywide Plan does not identify historic Pioneertown as part of the scenic vista within the Desert Region. Thus, as no scenic resources are located within the areas proposed for development, the proposed development would not have the potential to impact scenic views of individual onsite resources.

A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity, and a proposed development may interfere with the view to a scenic vista. As shown in Photos 1 through 9, the views surrounding the project site can be characterized by Black Hill to the north, with the Sawtooths located to the south of the project site, and native

vegetation characteristic of the Desert Region of San Bernardino County. Development at the proposed project site would not interfere with panoramic mountain views of Black Hill to the north, Little San Bernardino Mountains to the south, or any other surrounding mountain views as the proposed project is level in elevation to the surrounding area. Additionally, the existing residences to the south of the project, on the opposite side of Pioneertown Road, would not experience substantial viewshed changes as the proposed project would retain the existing Western historical character of the project site by sensitively restoring existing structures at the Soundstage and Gazette. Further the scale of the structures would remain the same as that which occurs within the project site at present, and as such, the existing visual setting would not be substantially altered by implementation of the proposed project. Designs for new structures that may be visible from surrounding areas, such as the new shade structure and enclosed patio for the Soundstage, would consider and complement the Western aesthetic of the project site.

Notwithstanding any potential impacts to scenic views that may be experienced from residences, the issue of guarantee of private views is one of the few qualitative environmental issues that the California Supreme Court has addressed. State court decisions regarding private views indicate that private views are not protected. Furthermore, the San Bernardino Countywide Plan and County Development Code do not protect private views, and this parcel is not zoned nor designated by the Countywide Plan for open space. Thus, private residential views of the project site in its present condition are not protected. As a result, while the immediate view of the project site will be modified as the site is improved from its current use, panoramic vistas to the area mountains will remain intact. Therefore, it is anticipated that the proposed project would have a less than significant impact on scenic vistas within the project area.

b. *Less Than Significant With Mitigation Incorporated* – The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor. As shown in the Photos 1 through 9, the views surrounding the project site can be characterized by Black Hill to the north, with the Sawtooths located to the south of the project site, and native vegetation characteristic of the Desert Region of San Bernardino County. The project site is located along Pioneertown Road, and is bounded by Mane Street, which are not considered by the State to be a scenic highway. The Countywide Plan[1] identifies several County Scenic Routes as shown on **Figure I-1**, and Pioneertown Road is designated as a County Scenic Route in this area. The proposed project would be installed adjacent to Pioneertown Road. However, the proposed project would be subject to the development criteria specific to properties adjacent to the County Scenic Route (County Development Code Section 82.19.040). Furthermore, as the proposed project would be compatible with the surrounding uses, and furthermore enhances the present use of the site, rather than constructing new uses, it is not anticipated that the proposed project would facilitate damage of scenic resources. As described above, the proposed project would comply with the Countywide Policy Plan, as well as by the standards of the San Bernardino Countywide Plan. Therefore, the proposed project would have a less than significant potential to damage scenic resources within a State or County scenic route.

[1] San Bernardino County, 2020. San Bernardino Countywide Plan. https://countywideplan.sbcounty.gov/policy-plan/ (accessed 09/20/25)

Note that, the Cultural Resources Report prepared for the project (**Appendix 3a**) revealed that two previously recorded contributing elements (the Pioneertown Gazette building and the Silver Dollar building [currently known as the Pioneertown Soundstage]) to the existing district (P-36- 25903) within the project site and recorded them on California Department of Park and Recreation (DPR) 523 forms. This district was listed on the National Register of Historic Places (the National Register) in 2020, which means that it is automatically listed on the California Register of Historical Resources (the California Register), making it a Historical Resource under CEQA.

Because the Pioneertown Mane Street Historic District is a Historic Property and a Historical Resource, any proposed project activities should be consistent with "plans for rehabilitation to ensure that the undertaking maintains consistency with the Secretary of the Interior Standards for the Treatment of Historic Properties."[2] Thus, **MM CUL-1** must be implemented to ensure that the standards for developing the proposed project align with the Secretary of Interior Standards, thereby ensuring that the proposed project preserves the historic nature of the structures on site, and thereby would not substantially alter a historic property such that a significant scenic impact would result. This is further substantiated by the findings made in the "*Historic Building Study and CEQA-Compliance Analysis Pioneertown Gazette and Soundstage Buildings, 53563 and 53585 Mane Street Pioneertown, San Bernardino County, California Conditional Use Permit Application No. 2022-00191"* prepared by CRM TECH for the proposed project, dated June 27, 2025 (**Appendix 3b**), which concluded that "If the project is designed and implemented in accordance with these recommendations and guidelines, it will not cause a substantial adverse change in the significance of this "historical resource." Refer to the recommendations presented therein to achieve the implementation of this criterion.

These recommendations shall be further enforced through the implementation of **MM CUL-1,** which shall require the enforcement of the above recommendations as part of the County's review and approval of the project design. Additionally, no rock outcroppings would be impacted by the proposed project, as none have been observed within the project site. As stated under Threshold (a), above, the proposed project is developed with no trees on site that would fall under the County's tree ordinance. No other scenic resources have been identified on the site. Therefore, with the implementation of **MM CUL-1** the proposed project would have a less than significant potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c. *Less Than Significant Impact* – The proposed project is located in a relatively sparsely developed portion of the County, and according to the State Office of Planning and Research "Site Check,"[3] it does not meet the legal criteria for an urbanized area. Therefore, the threshold related to non-urbanized areas will be utilized. Refer to **Figure 1**, which depicts an aerial view of the project area. The proposed project would be installed to be compatible with the types of surrounding uses (in both land use and type), in that the architecture, scale, and historic character of the site will be retained and remain similar, and furthermore enhance the present use of the site, rather than creating an entirely new site use. As a result, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings; instead, by enhancing the

[2] 36 CFR part 68; see https://www.nps.gov/orgs/1739/index.htm (Accessed 09/20/25)
[3] LCI, 2025. Site Check. https://sitecheck.lci.ca.gov/ (Accessed 09/20/25)

existing features of the site—Pioneertown Soundstage and Pioneertown Gazette—the proposed project would enhance the existing visual character and quality of the site, thereby improving public views of the site and its surrounding area.

For informational purposes, the proposed project would be compatible with the Countywide Policy Plan's visual resources and aesthetic policies including:

- **Policy LU-2.1 Compatibility with existing uses.** We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development.
    - The proposed project is on a similar scale as the surrounding uses and to that which exists on site presently.
- **Policy LU-2.4 Land use map consistency.** We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the County Development Code, may be required to maximize compatibility with surrounding land uses and community identity.
    - The proposed project is compatible with the land use map designation, with the approval of a CUP, which the County determined to be necessary due to the nature of the Soundstage and proposed outdoor uses, which would host a variety of uses that, according to the County Development Code Table 82-17 as it pertains to SD-RES uses, require a Conditional Use Permit.
- **Policy LU-4.7 Dark skies.** We minimize light pollution and glare to preserve views of the night sky, particularly in the Mountain and Desert regions where dark skies are fundamentally connected to community identities and local economies. We also promote the preservation of dark skies to assist the military in testing, training, and operations.
    - The County has adopted the San Bernardino Night Sky Ordinance. All new development, including the proposed project, may incrementally change conditions of nighttime views and the character of dark skies, but the project would be required to adhere to County standards for lighting and glare to ensure that impacts to night skies would be minimized to a level of less than significant (refer to analysis presented in issue I(d), below).
- **Policy LU-4.1 Context-sensitive design in the Mountain/Desert regions.** We require new development to employ site and building design techniques and use building materials that reflect the natural mountain or desert environment and preserve scenic resources.
    - The proposed project would be installed to be compatible with the types of surrounding uses, in that the architecture, scale, and historic character of the site will be retained and remain similar, and furthermore enhances the present use of the site, rather than creating an entirely new site use.
- **Policy NR-4.1 Preservation of scenic resources.** We consider the location and scale of development to preserve regionally significant scenic vistas and natural features, including prominent hillsides, ridgelines, dominant landforms, and reservoirs.
    - As discussed under this topic, the proposed project would not conflict with the preservation of scenic resources.

- **Policy NR-4.3 Off-site signage.** We prohibit new off-site signage and encourage the removal of existing off-site signage along or within view of County Scenic Routes and State Scenic Highways.
    - The proposed project would not install offsite signage, thus meeting the provisions of this policy. The proposed project would not result in a significant change in viewshed in the vicinity of any County Scenic Route (Pioneertown Road).

Thus, with the design elements that have been incorporated into the project—i.e. preservation of historical resources on site, in addition to restoration of the existing historical structure, as well as compliance with the County Development Code—the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings nor would it conflict with applicable zoning or other regulations governing scenic quality, and therefore, impacts would be less than significant.

d. *Less Than Significant Impact* – Implementation of the proposed project will create only limited new sources of light during the occupancy phase of the project. Existing sources of light in the project area include nearby rural residences and occasional headlights from the adjacent roadways. The County Development Code requires new projects to adhere to the provisions of the Chapter 83.07.060 Glare and Outdoor Lighting – Mountain and Desert Requirements. The Development Code requires that outdoor lighting meet shielding requirements, light pollution standards, automated control standards, dark sky curfew, and other requirements. While the proposed project will generate a new source of lighting in support of the outdoor shade structure, the project lighting will be consistent with that which exists onsite at the present because the Soundstage is an existing operational use that will be improved and expanded by the proposed project. Further, the proposed project will be required to adhere to the County Development Code light and glare requirements. As the proposed project would reflect to continued and enhanced operation of an existing operational use that currently utilizes lighting for the same uses, including events (nighttime lighting) and standard hours of operation, no mitigation will be required for lighting at this location and with County Development Code compliance, and potential light and glare impacts associated with the proposed project will be a less than significant impact.

Mitigation Program

CUL-1 The proposed project shall be designed to be consistent with the plans for rehabilitation to ensure that the undertaking maintains consistency with the "Secretary of the Interior Standards for the Treatment of Historic Properties" (36 CFR part 68; see http://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm).

Further, the recommendations presented in CRM TECH's Historic Building Study and CEQA-Compliance Analysis (Appendix 3b) shall be enforced and incorporated into the project design. These are:

1. **A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**

2. **The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**
3. **Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.**
4. **Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.**
5. **Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.**
6. **Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**
7. **Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.**
8. **Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.**
9. **New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**
10. **New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.**

Regarding the property treatment of historic buildings during "work that must be done to meet accessibility and life-safety requirements," guidelines for implementing the Secretary of the Interior's Standards offer the following recommendations that shall be implemented by the Developer of the project (Weeks and Grimmer 2017:69):

- **Identify the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work.**
- **Comply with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.**
- **Work with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a historic building, its site, and setting.**
- **Provide barrier-free access that promotes independence for the user while preserving significant historic features.**

- **Find solutions to meet accessibility requirements that minimize the impact of any necessary alteration for accessibility on the historic building, its site, or setting, such as compatible ramps, paths, and lifts.**

The developer shall demonstrate consistency with 36 CFR part 68 standards in the plans for development submitted to the County, and plans must be approved by the County prior to construction.

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measure.

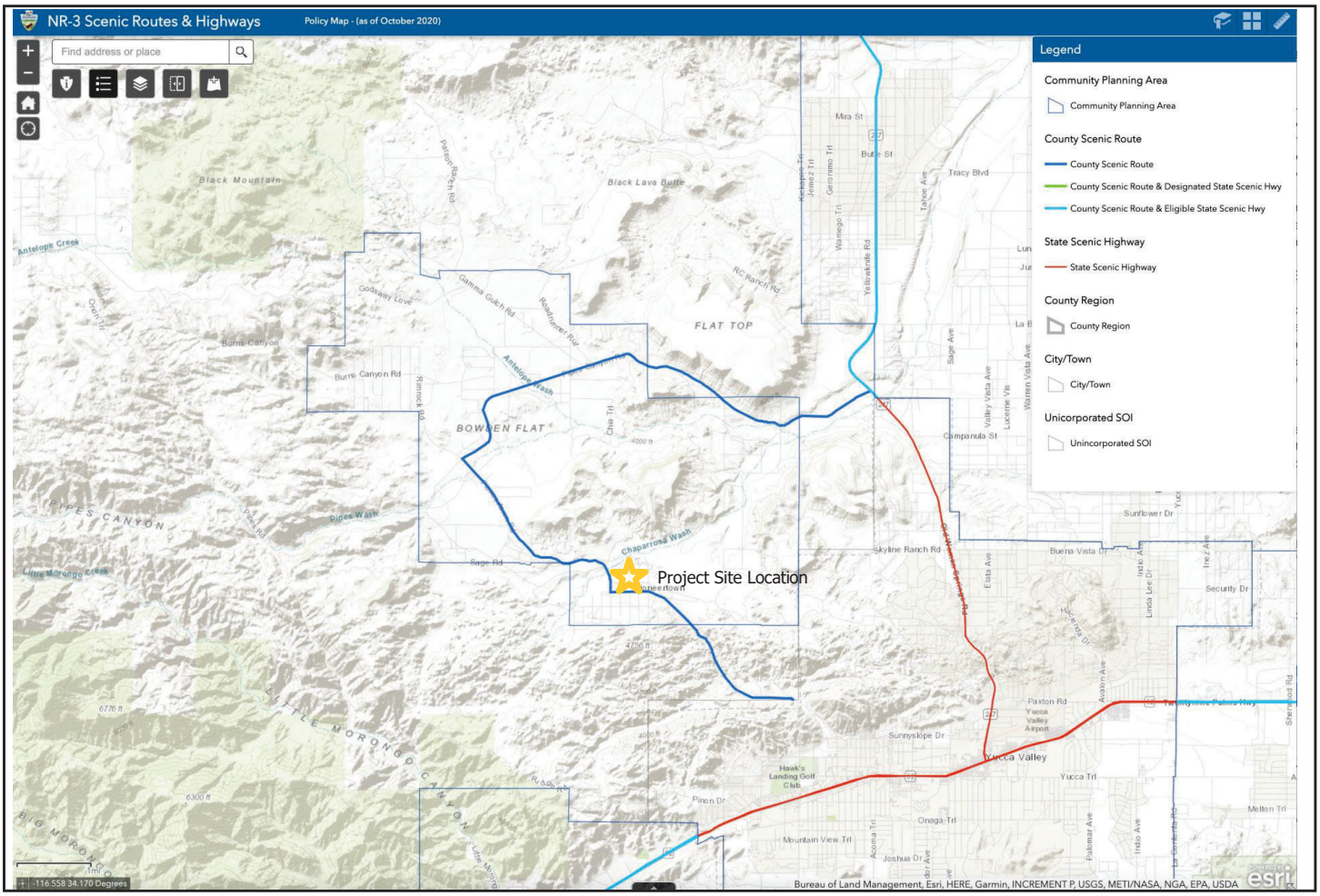


FIGURE I-1

Tom Dodson & Associates
Environmental Consultants

Scenic Highways Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. AGRICULTURE AND FORESTRY RESOURCES: 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 signi-ficant 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

II. AGRICULTURE AND FORESTRY RESOURCES

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

Impact Analysis

a. *No Impact* – The proposed project will occur within an area consisting of native vegetation and trees, and does not contain any agricultural uses. Neither the project footprint nor the surrounding

area is designated for agricultural use; no agricultural activities exist in the project area; and there is no potential for impact to any agricultural uses or values as a result of project implementation. According to the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Natural Resources Agency, which are depicted as part of the Countywide Plan Farmland Map, no prime farmland, unique farmland, or farmland of state importance exist within the vicinity of the proposed project (**Figure II-1**). No adverse impact on any agricultural resources would occur from implementing the proposed project. No mitigation is required.

b. *No Impact* – There are no agricultural uses currently within the boundaries of the project site or adjacent to the project site, and the project site itself is not under a Williamson Act Contract. The San Bernardino County Countywide Plan Land Use designation is Commercial (C), while the Zoning classification is Rural Commercial, while the Zoning District is Special Development-Residential (SD-RES). Therefore, no potential exists for a conflict between the proposed project and agricultural zoning or Williamson Act contracts within the project area. No impacts are anticipated and no mitigation is required.

c. *No Impact* – Please refer to issues II(a) and II(b) above. The proposed Pioneertown Soundstage Project would be located within a rural desert community. Neither the project site nor the adjacent and surrounding properties support forest land or timberland uses or associated designations. No potential exists for a conflict between the proposed project and forest/timberland zoning. No impacts are anticipated and no mitigation is required.

d. *No Impact* – There are no forest lands within the project area. No potential for loss of forest land would occur if the project is implemented. No impacts are anticipated and no mitigation is required.

e. *No Impact* – Because the project sites and surrounding area do not support either agricultural or forestry uses and, furthermore, because the project sites and environs are not designated for such uses, implementation of the proposed project would not cause or result in the conversion of Farmland or forest land to alternative uses. No adverse impact would occur. No mitigation is required.

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

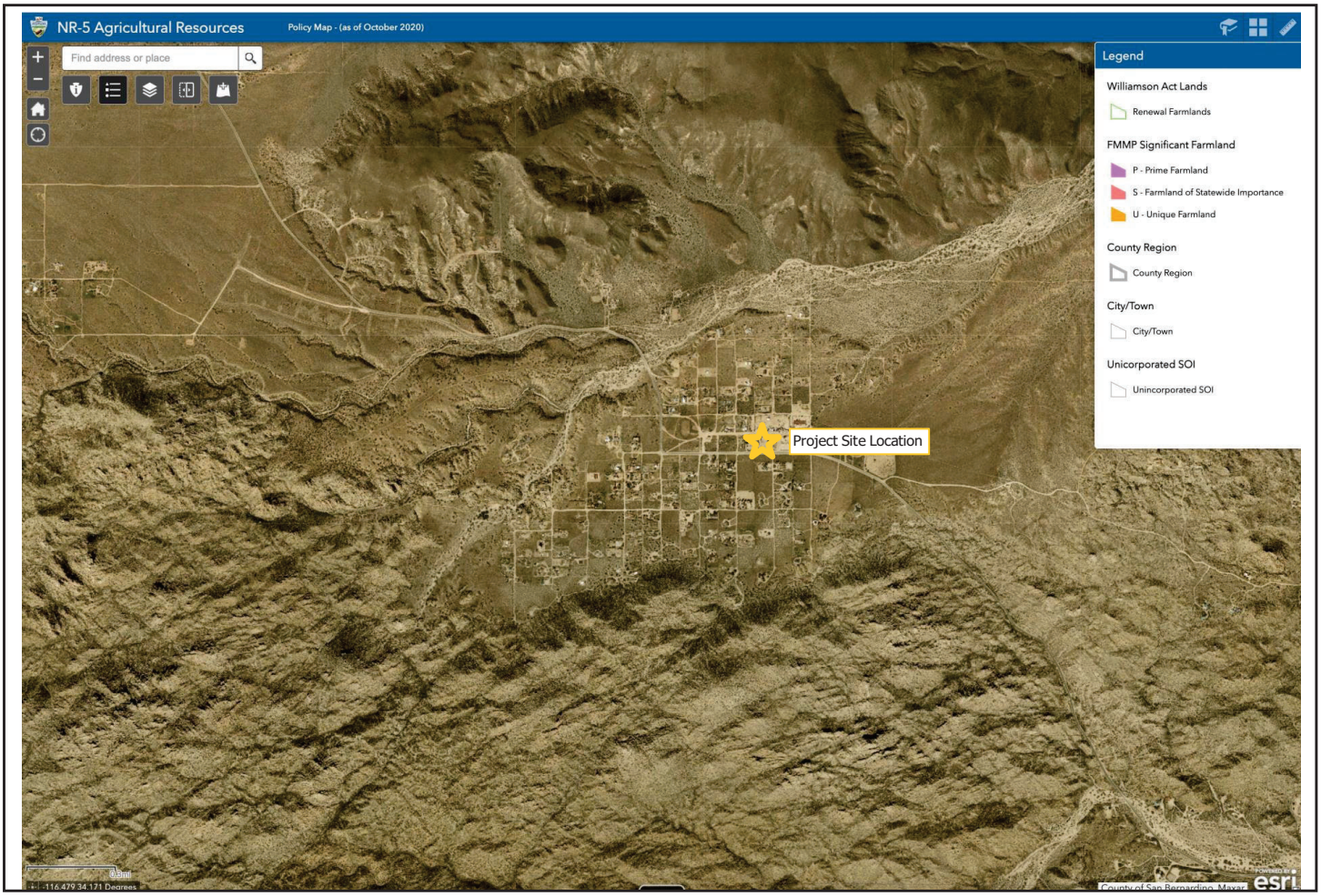


FIGURE II-1

Tom Dodson & Associates
Environmental Consultants

Agricultural Resources Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: 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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Pioneertown Mane Street Preservation and Improvement Plan Project Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated December 2, 2025. This AQGGA is provided as **Appendix 1** to this Initial Study.

Background

The project site is located in the portion of the County that is part of the MDAB and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The air quality assessment for the project evaluates emissions impacts associated with short-term construction and long-term operation of the project. A number of air quality modeling tools are available to assess the air quality impacts of projects, and in this case, the current version of CalEEMod 2022, which was released in May of 2022 with subsequent updates, was used to model air quality and greenhouse gas emissions/impacts associated with the project. In addition, certain air districts, such as the MDAQMD, have created guidelines and requirements to conduct air quality analyses. The MDAQMD's current guidelines, included in its *California Environmental Quality Act and Federal Conformity Guidelines* (August 2016), were adhered to in the assessment of air quality impacts for the project.

Climate

Air quality in the project area is not only affected by various emissions sources (mobile, industry, etc.) but is also affected by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall.

The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains within 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 is approximately 10,000 feet), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 feet). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 feet) between the San Bernardino and San Jacinto Mountains.

During the summer, the MDAB is generally influenced by a Pacific subtropical high cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The MDAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. The MDAB averages between three and seven inches of precipitation per year (from 16 to 30 days with at least 0.01 inch of precipitation). The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate that at least three months have maximum average temperatures over 100.4° F.

Snow is common above 5,000 feet in elevation, resulting in moderate snowpack and limited spring runoff. Below 5,000 feet, any precipitation normally occurs as rainfall. Pacific storm fronts normally move into the area from the west, driven by prevailing winds from the west and southwest. During late summer, moist high-pressure systems from the Pacific collide with rising heated air from desert areas, resulting in brief, high-intensity thunderstorms that can cause high winds and localized flash flooding

Applicable Regulatory Requirements

MDAQMD Rules that are currently applicable during construction activity for this project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

MDAQMD Rule 403

The purpose of this rule is to reduce the amount of PM_{10} entrained in the ambient air from anthropogenic fugitive dust sources within the MDAQMD by requiring actions to prevent, reduce, or mitigate fugitive dust. The following measures shall be incorporated into project plans and specifications as implementation of Rule 403.

- Use periodic watering for short-term stabilization of Disturbed Surface Area to minimize visible fugitive dust emissions. For purposes of this Rule, use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient to maintain compliance.
- Take actions sufficient to prevent project-related trackout onto paved surfaces.

MDAQMD Rule 1113

The purpose of this rule is to limit the quantity of volatile organic compounds (VOC) in architectural coatings. The following measures shall be incorporated into project plans and specifications as implementation of MDAQMD Rule 1113.

- Only "Low-VOC" paints consistent with MDAQMD Rule 1113 shall be used.

Methodology

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this project to determine construction and operational air quality and GHG emissions.

Air Quality Regional Emissions Thresholds

The MDAQMD has developed regional significance thresholds for criteria pollutants, as summarized at Table III-1. The MDAQMD's *CEQA and Federal Conformity Guidelines* indicate that any projects in the MDAB with daily regional emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table III-1: Maximum Daily Regional Emissions Thresholds

Pollutant	Regional Thresholds
NO_X	137 lbs/day
VOC	137 lbs/day
PM_{10}	82 lbs/day
$PM_{2.5}$	65 lbs/day
SO_X	137 lbs/day
CO	548 lbs/day

lbs/day = Pounds Per Day

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the Mojave Desert set forth a comprehensive set of programs that will lead the MDAB into compliance with federal and State air quality standards. The control measures and related emission reduction estimates within the Federal Particulate Matter Attainment Plan and Ozone Attainment Plan are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with these attainment plans for development projects is determined by demonstrating compliance with the indicators discussed below:

Consistency Criterion No. 1

The project proposes redevelopment of an existing historically themed retail area with construction of 3,024 square feet shaded outdoor dining area situated in between the existing Soundstage and Gazette buildings. New modular structures are proposed to serve as public restrooms, mobile snack cart, and a self-contained mobile kitchen. The existing structures will be remodeled to serve two purposes: an event and hospitality space (Soundstage) and an Ice Cream/Coffee Shop (Gazette).

The Soundstage remodel includes new ADA restrooms, ADA parking, Bar Area, and Lounge. The interior of Soundstage will be a flexible open area in the middle with permanent seating on the interior perimeter. The outdoor patio area will have non-fixed picnic tables. Utility improvements include a new septic waste system and new electrical panel. The San Bernardino County designates the project site for Commercial land uses, which is intended for retail trade and personal services, repair services, lodging services, recreation and entertainment services, transportation services, and similar and compatible uses. Agriculture and residential uses allowed also but are secondary in importance. Additionally, the project site is zoned as SD-RES. The Special-Development zoning category allows for a mix of residential, commercial, and industrial uses. A Residential subcategory designation indicates that the primary focus is on residential planned development projects. The project is consistent with the Commercial land use designation but is inconsistent with the Special-Development Residential zoning designation. However, since the project regional construction and operational emissions (refer to Tables III-4 and III-5 under issue III(b), below)do not exceed the thresholds of significance, the project would not cause an exceedance of an air quality violation.

On the basis of the preceding discussion, the project is determined to be consistent with Criterion No. 1 and a less than significant impact is expected.

It should also be noted that since the proposed project is not a residential use, it does not contribute directly to an increase in population. As such, there would be no impact on population projections, and consequently, the project's implementation would not alter the assumptions or forecasts within the AQMP.

Consistency Criterion No. 2

All MDAQMD Rules and Regulations

The project would be required to comply with all applicable MDAQMD Rules and Regulations, including, but not limited to Rules 401 (Visible Emissions), 402 (Nuisance), 403 (Fugitive Dust), and 1113 (Architectural Coatings). As previously stated, the project would implement MDAQMD Rule 403 and MDAQMD Rule 1113. While compliance with all applicable rules is mandatory, only the emission reductions associated with implementation of Rule 403 and Rule 1113 can be quantified in CalEEMod.

Consistency Criterion No. 3

Demonstrating that the project will not increase the frequency or severity of a violation in the federal or state ambient air quality standards

As the project's construction and operational-source emissions would not exceed applicable MDAQMD significance thresholds. As such, the project would not have the potential to increase the frequency or severity of a violation in the federal or state ambient air quality for on-going project operations.

Valley Fever

Valley Fever, *Coccidioidomycosis*, more commonly known as "valley fever," is an infection caused by inhalation of the spores of the Coccidioides immitis fungus, which grows in the soils of the southwestern United States. The fungus is very prevalent in the soils of California's San Joaquin Valley, particularly in Kern County. The ecological factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, sandy soils.

San Bernardino County is not considered a highly endemic county (i.e., highly endemic meaning more than 20 cases annually of valley fever per 100,000 people) based on the incidence rates reported through 2024. The latest report from the California Department of Public Health indicates that San Bernardino County had 178 cases in 2024, or 8.2 cases per 100,000 people.

Construction of the proposed project has the potential to generate fugitive dust that may suspend coccidioides spores and expose sensitive receptors. The project site is located in an area with low Valley Fever activity; however, there is still a potential for exposure. As previously stated, the Project would be required to comply with all applicable MDAQMD Rules and Regulations, including Rule 403 (Fugitive Dust). Implementation of Rule 403 would reduce fugitive dust minimizing exposure of coccidioides spores to workers and receptors. Recommended construction activity mitigation intended to minimize fugitive dust impacts includes **MMs AQ-1 through AQ-6**.Therefore, impacts related to Valley Fever from the proposed project would be less than significant with the implementation of mitigation.

AQMP Consistency Conclusion

The project's proposed land uses are consistent with the Countywide Plan land use designations, and the project would not exceed the applicable regional thresholds during construction or operations for emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ and would therefore be considered to have a less than significant impact. Therefore, the project is considered to be consistent with the AQMP and impacts under this issue are considered less than significant.

b. *Less Than Significant With Mitigation Incorporated* – The MDAQMD relies on the South Coast Air Quality Management District (SCAQMD) guidance for determining cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the SCAQMD clearly states (Page D-3):

"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD

to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which MDAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Construction Activities

Construction activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

Project Construction
- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Septic Tank Construction
- Linear, Grading & Excavation
- Linear, Drainage, Utilities, & Sub-Grade
- Linear, Trenching

Dust Emissions

Dust is typically a major concern during demolition and grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emission rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from these phases of activity.

Dust Emissions

As previously mentioned, the existing structures will be remodeled for two purposes: an event and hospitality space (Soundstage) and an ice cream/coffee shop (Gazette). As a conservative estimate, this analysis assumes the potential demolition of interior structures (e.g., drywall, flooring, ceiling, etc.) and anticipates that demolition activities may generate up to 100 tons of debris.

Grading Activities

This analysis assumes that earthwork activities are expected to balance on site, and no import or export of soil would be required.

On-Road Trips

Construction generates on-road vehicle emissions from vehicle usage for workers and vendors commuting to and from the site. For the purposes of this analysis, it is assumed that approximately 10 to 15 employees will be required to support the construction of the project each day. Additionally, a maximum of 30 round trips per day will be made for the delivery of construction supplies and the removal of excavated materials.

Construction Duration

While construction of the project is projected to occur beginning in June of 2026 and would be completed by August of 2027. However, for purposes of analysis, construction of the project was expected to commence in October 2025 and would last through December 2026. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[4] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*.

Table III-2: Construction Duration

Construction Activity	Start Date	End Date	Days
Project Construction			
Demolition	10/01/2025	10/14/2025	10
Site Preparation	10/15/2025	12/02/2025	35
Building Construction	12/03/2025	12/29/2026	280
Paving	12/16/2026	12/29/2026	10
Architectural Coating	12/16/2026	12/29/2026	10
Septic Tank Construction			
Linear, Grading & Excavation	06/01/2026	07/01/2026	23
Linear, Drainage, Utilities, & Sub-Grade	07/02/2026	07/22/2026	15
Linear, Trenching	07/23/2026	08/07/2026	12

Construction Equipment

Equipment used for vertical and linear construction of the project at either site is shown in Table III-3.

[4] As shown in the CalEEMod User's Guide Version 2022, Appendix G "Table G-11. Statewide Average Annual Offroad Equipment Emission Factors" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Table III-3: Construction Equipment

Construction Activity	Equipment	Quantity	Hours
Project Construction			
Demolition	Rubber Tired Dozers	1	8
	Concrete/Industrial Saws	1	8
	Crawler Tractors	3	8
Site Preparation	Graders	1	8
	Rubber Tired Dozers	1	8
	Crawler Tractors	1	8
Building Construction	Cranes	1	8
	Forklifts	1	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	1	8
	Welders	3	8
Paving	Tractors/Loaders/Backhoes	1	8
	Pavers	1	8
	Paving Equipment	1	8
	Rollers	1	8
	Cement and Mortar Mixers	1	8
Architectural Coating	Air Compressors	1	8
Linear Construction			
Linear, Grading & Excavation	Tractors/Loaders/Backhoes	2	8
	Skid Steer Loader	1	8
Linear. Drainage, Utilities, & Sub-Grade	Tractors/Loaders/Backhoes	1	8
Linear, Trenching	Trenchers	2	8

Regional Construction Emissions Summary

The estimated maximum daily construction emissions without mitigation are summarized in Table III-4. Under the assumed scenarios, emissions resulting from the project construction at the site would not exceed thresholds established by the MDAQMD for emissions of any criteria pollutant. project construction-source emissions impacts would therefore be less-than-significant. Detailed construction model outputs are presented in **Appendices 1 and 2** to the AQGGA.

Table III-4: Regional Construction Emissions Summary

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
2026	1.68	14.70	19.12	0.05	1.25	0.64
Winter						
2025	2.19	20.70	18.80	0.04	3.53	1.83
2026	4.78	22.20	25.70	0.08	2.99	1.23

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	4.78	22.20	25.70	0.08	3.53	1.83
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Short-term emissions are primarily related to the construction of the project and are recognized to be short in duration and without lasting impacts on air quality. With the enhanced dust control mitigation measures listed below, construction activity air pollution emissions are not expected to exceed MDAQMD CEQA thresholds for any pollutant. Regardless, the PM_{10} non-attainment status of the Mojave Desert area requires that Best Available Control Measures (BACMs) be used as required by the MDAQMD Rule 403. Recommended construction activity mitigation includes **MMs AQ-1 through AQ-6,** each of which is intended to minimize fugitive dust impacts. The project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed project construction-source air pollutant emissions would not result in exceedances of regional thresholds. With the above mitigation measures, any impacts related to construction emissions are considered less than significant on a project-specific and cumulative basis. No further mitigation is required.

Regional Operational Emissions

The project site is currently developed with 6,223 square foot event and hospitality space (Soundstage) and 831 square foot commercial structure (Gazette). The existing commercial structure (Gazette) is proposed to be redeveloped as an ice cream/coffee shop. The estimated operation-source emissions from the commercial structure (Gazette) are summarized in Table III-5.

Table III-5: Operational Emissions from Existing Development

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Mobile	0.08	0.12	1.12	< 0.005	0.24	0.06
Area	0.02	< 0.005	0.04	< 0.005	< 0.005	< 0.005
Energy	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Maximum Daily Emissions	0.10	0.12	1.16	<0.005	0.24	0.06
Winter						
Mobile	0.07	0.13	0.83	< 0.005	0.24	0.06
Area	0.02	<0.01	<0.01	<0.01	<0.01	<0.01
Energy	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Maximum Daily Emissions	0.09	0.13	0.83	<0.005	0.24	0.06

Operational activities associated with the project would result in emissions of CO, VOCs, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. Operational related emissions are expected from the following primary sources: area source emissions, mobile source emissions, and energy source emissions.

The project related operational air quality impacts derive primarily from vehicle trips generated by

the proposed project. Trip characteristics available from the *Pioneertown Mane Street Preservation and Improvement Plan Project Transportation Screening Assessment* (**Appendix 6**) were utilized in this analysis.

Operational emissions associated with the project are summarized in Table III-6.

Table III-6: Total Project Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Mobile	3.20	3.90	38.00	0.09	7.80	2.00
Area	0.37	<0.005	0.53	<0.005	<0.005	<0.005
Energy	0.01	0.25	0.21	<0.005	0.02	0.02
Maximum Daily Emissions	3.58	4.15	38.74	0.09	7.82	2.02
Existing	*0.10*	*0.12*	*1.16*	*<0.005*	*0.24*	*0.06*
Net New Emissions (Project - Existing)	3.48	4.02	37.57	0.09	7.58	1.96
MDAQMD Regional Thresholds	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile	2.90	4.30	28.00	0.08	7.80	2.00
Area	0.28	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.25	0.21	0.00	0.02	0.02
Maximum Daily Emissions	3.19	4.55	28.21	0.08	7.82	2.02
Existing	*0.09*	*0.13*	*0.83*	*<0.005*	*0.24*	*0.06*
Net New Emissions (Project - Existing)	3.10	4.41	27.37	0.08	7.58	1.96
MDAQMD Regional Thresholds	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Project operational-source emissions would not exceed the numerical thresholds of significance established by the MDAQMD for any criteria pollutant, a less than significant impact would occur for project-related operational-source emissions and no mitigation is required.

Conclusion

With the incorporation of mitigation measures (**MMs**) **AQ-1** through **AQ-6**, the development of the project would have a less than significant potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c. *Less Than Significant Impact* – The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors.

As per the MDAQMD's *Guidelines*, the following project types are located within a specified distance

to an existing or planned sensitive receptor land use must be evaluated to determine exposure of substantial pollutant concentrations to sensitive receptors:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The proposed project's land uses do not include the above uses. As such, no analysis for sensitive receptors is required. Additionally, results of the regional analysis indicate that the project will not exceed the MDAQMD significance thresholds during construction or operations. Therefore, sensitive receptors would not be subject to a significant air quality impact during project construction and operational activities.

The construction analysis previously presented is intentionally conservative (i.e. overstates rather than understates potential air emissions). In reality, construction is expected to be very limited and includes the development of amenities including a new sound stage and outdoor dining area which would not require significant grading or involve the construction of a large building. As a result, there will be little to no heavy diesel construction equipment and consequently no substantive exposure to sensitive receptors from diesel particulate matter (DPM) from construction activity.

d. *Less Than Significant Impact* – Substantial odor-generating sources include land uses such as Agricultural uses (livestock and farming), Wastewater treatment plants, Food processing plants, Chemical plants, Composting operations, Refineries, Landfills, Dairies, and Fiberglass molding facilities. The project does not contain land uses typically associated with emitting 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 and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed project would also be required to comply with MDAQMD Rule 402 to prevent occurrences of public nuisances. The septic tank will be maintained properly, which will ensure that no odors emit from its operation in support of the project site its operation would adversely affect a substantial number of people. Therefore, odors associated with the proposed project construction and operations would be less than significant, and no mitigation is required.

Mitigation Program

AQ-1 **The following measures shall be incorporated into project plans and specifications for implementation:**

- **Apply soil stabilizers such as hay bales or aggregate cover to inactive areas.**
- **Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.**

- **Stabilize previously disturbed areas if subsequent construction is delayed.**
- **Water exposed surfaces and haul roads 3 times/day.**
- **Cover all stockpiles with tarps.**
- **Replace ground cover in disturbed areas quickly.**
- **Reduce speeds on unpaved roads to less than 15 mph.**
- **Trenches shall be left exposed for as short a time as possible.**

AQ-2 **The following signage shall be erected no later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:**

"[Site Name] {four-inch text}
[project Name/project Number] {four-inch text}
IF YOU SEE DUST COMING FROM {four-inch text}
THIS PROJECT CALL: {six-inch text}
[Contact Name], PHONE NUMBER {six-inch text}
If you do not receive a response, Please Call {three-inch text} The MDAQMD at 1-800-635-4617 {three-inch text}"

AQ-3 **During project construction a (minimum) 3,000-gallon water truck shall be available on-site at all times for dust control.**

AQ-4 **During Construction, wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting.**

AQ-5 **The Developer shall use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. If the site contains exposed sand or fines deposits (and if the project would expose such soils through earthmoving), water application or chemical stabilization will be required to eliminate visible dust/sand from sand/fines deposits.**

AQ-6 **The Developer shall formulate a high wind response plan that addresses enhanced dust control if winds are forecast to exceed 25-mph in any upcoming 24-hour period.**

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measures.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☒	☐	☐
e) 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?	☐	☐	☐	☒

SUBSTANTIATION: (Check if project is located in the Biological Overlay [**Figure IV-1**] or contains habitat for any species listed in the California Natural Diversity Database ☒). The project is located in the County's Biological Overlay for Burrowing Owl and Desert Tortoise: Sparse. The following information is provided based on a study titled "*Biological Resources Assessment for the Proposed Pioneertown Mane Street Preservation and Improvement Plan Located within Assessor Parcel Numbers 0594- 391-06, -07, and -08 in the Community of Pioneertown, San Bernardino County, California" (BRA)* prepared by ELMT Consulting, Inc. dated October 16, 2024, provided as **Appendix 2**.

General Setting

Vegetation

Due to historic and ongoing land uses, no natural plant communities are supported within or adjacent to the project site. The site supports two (2) land cover types that would be classified as disturbed and developed (Figure IV-2).

Narrow swaths of disturbed land are supported along site boundaries where routine weed abatement and maintenance activities occur. These areas primarily support weedy/early successional species that are adapted to establishing in routinely disturbed areas. Common plant species observed in the disturbed portions of the project site include devil's lettuce (*Amsinckia tesselata*), desert mariposa-lily (*Calochortus kennedyi*), wingnut cryptantha (*Cryptantha pectocarya*), sacred datura (*Datura wrightii*), rubber rabbitbrush (*Ericameria nauseosa*), California buckwheat (*Eriogonum fasciculatum*), Saharan mustard (*Brassica tournefortii*), red brome (*Bromus rubens*), red-stemmed filaree (*Erodium cicutarum*), foxtail (*Hordeum murinum*), prickly lettuce (*Lactuca serriola*), Mediterranean grass (*Schismus barbatus*), and London rocket (*Sisymbrium irio*).

The majority of the project site supports developed land with existing commercial development, ornamental landscaping, parking lots, and the Mane Street Historic District. Vegetation supported in the developed portions of the site is generally limited to ornamental landscaping, with limited weedy/early successional species present. Parking lots are unpaved; however, they are periodically subject to sufficient disturbances from lot maintenance and vehicle and pedestrian access to prevent the establishment of a plant community. Common species observed in the developed and ornamentally landscaped portions of the project site include western Joshua tree (*Yucca brevifolia*), oleander (*Nerium oleander*), Italian cypress (*Cupressus sempervirens*), red-stemmed filaree, Saharan mustard, and desert mariposa-lily.

Wildlife

Plant communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a discussion of those wildlife species that were observed or are expected to occur within the project site. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions in which the field investigation was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation. The project site provides limited habitat for wildlife species except those adapted to a high degree of anthropogenic disturbances and development.

Nesting Birds

No active nests associated with native avian species were observed on-site during the field investigation. Multiple avians, including ladder-backed woodpeckers, northern mockingbirds, and house finches, were observed exhibiting nesting behaviors including territorial displays and nest construction and excavation. The project site and surrounding area, including structures, provide suitable nesting opportunities for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that adapted to frequent vehicle and pedestrian presence. In addition, tall electrical poles and ornamental trees observed in the surrounding area provide suitable nesting opportunities for raptor species adapted to the aforementioned routine disturbances.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). Typical guidance for protecting nesting birds is that, if construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. However, based on recent guidance from the California Department of Fish and Wildlife (CDFW), preconstruction nesting bird surveys shall occur regardless of the time of year due to changing climate resulting in nesting out of season.

Special-Status Plants

According to the CNDDB and CNPS, twenty-five (25) special-status plant species have been recorded in the Rimrock and Yucca Valley North quadrangles. The project site supports exclusively developed and highly disturbed land and no natural plant communities are supported within or adjacent to site boundaries. One (1) special-status plant species, western Joshua tree, was observed on-site during the field investigation. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the project site does not have potential to support any of the other special-status plant species known to occur in the vicinity of the site and all are presumed to be absent.

Western Joshua Tree

The California Fish and Game Commission (Commission) designated the western Joshua tree (*Yucca brevifolia*) as a candidate for listing under the California Endangered Species Act (CESA) in October 2020. This action afforded the western Joshua tree the same CESA protections as listed species, which means that removal of the desert trees was subject to fines and criminal penalties unless authorized by a "take" permit issued by the CDFW. Such permits were difficult to obtain, and when issued would authorize removal only in limited circumstances. The new law, which became effective July 1, streamlines the western Joshua Tree take permit process and broadens the purposes for which a permit may be issued. A western Joshua tree may now be removed for any purpose, so long as a permit is obtained and the removal is fully mitigated, or alternatively, an in-lieu mitigation fee is paid. The table below summarizes the new rules for the area in which the project site is located.

Table IV-1: Western Joshua Tree Mitigation

Location	Mitigation Fees
The project site is not located within the Reduced Mitigation Fee Area.	Full mitigation, or in-lieu fee as follows: • $2,500 per tree > 5 meters tall • $500 per tree 1 to 5 meters tall • $340 per tree < 1 meter tall

A total of six (6) western Joshua trees measuring between 1 and 5 meters in height were observed on the northern boundary of the project site along Mane Street in accordance with western Joshua tree protocols. These western Joshua trees are shown overlaid on the site plan in **Figure IV-2**. No western Joshua trees are expected to be directly impacted by project implementation, and they will be protected in place. Project impacts will occur within 50 feet of the mapped western Joshua trees.

Special-Status Plant Communities

No special-status plant communities were identified as occurring in the Rimrock and Yucca Valley North quadrangles and no special-status plant communities were observed during the field investigation. Therefore, no special-status plant communities will be impacted by project implementation.

Special-Status Wildlife

According to the CNDDB, ten (10) special-status wildlife species have been reported in the Rimrock and Yucca Valley North quadrangles (refer to Attachment D of **Appendix 2**). The project site supports exclusively developed and highly disturbed land and no natural plant communities are supported within or adjacent to site boundaries. No special-status wildlife species or signs thereof (i.e., burrows, scat, etc.) were observed during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site habitats and isolation of the site from natural habitats, it was determined that the proposed project site does not have potential to support any of the special-status wildlife species known to occur in the vicinity of the site and all are presumed to be absent.

In order to ensure impacts to special-status avian species do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance. With implementation of the pre-construction nesting bird clearance survey, impacts to special-status avian species will be less than significant and no mitigation will be required.

Due to regional significance and listing status, the potential occurrence of burrowing owl and desert tortoise are discussed in further detail below.

Burrowing Owl

On October 25, 2024, the California Fish and Game Commission also accepted a petition to make the western burrowing owl (*Athene cunicularia*)(BUOW) a candidate for listing as a threatened or endangered species under CESA and this species also now receives the same legal protection afforded to a state listed threatened or endangered species. This species is also protected by international treaty under the MBTA and by State law under the California FGC (FGC #3513 & #3503.5). It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently sloping areas characterized by sparse vegetation and bare ground. Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting. The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-mad cavities, such as buried and non-functioning drainpipes, standpipes, and dry culverts. Burrowing mammals may be burrowed beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

No burrowing owls or new sign of use (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The land cover types supported by the site allow for line-of-sight observation favored by burrowing owls. However, no suitable burrows (>4 inches) for roosting and nesting were observed on- site. Further, routine anthropogenic disturbance associated with existing

land uses preclude burrowing owl from occurring on-site. Therefore, the project site was determined not have potential to support burrowing owl. No further surveys are recommended.

Desert Tortoise

The Mojave population of the desert tortoise (*Gopherus agassizii*) inhabits areas north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Sonoran Desert in California. Throughout the majority of the Mojave Desert, desert tortoises occur most commonly on gentle sloping soils characterized by an even mix of sand and gravel and sparsely vegetated low-growing vegetation where there is abundant inter-shrub space. Typical habitat for the Mojave Desert Tortoise has been characterized as Mojavean desert scrub below 5,500 feet in elevation with a high diversity of perennial and ephemeral plants. The dominant shrub commonly associated with desert tortoise habitat is creosote bush; however, other shrubs including burrobush (*Ambrosia dumosa*), Mojave yucca, cheesebush (*Ambrosia salsola*), and Mojave prickly pear (*Opuntia mojavensis*) also provide suitable habitat. The desert tortoise spends 95 percent of its life underground and will opportunistically utilize burrows of various lengths, deep caves, rock and caliche crevices, or overhangs for cover. Therefore, moderately friable soil is required to allow for burrow construction and ensure that burrows do not collapse.

No live desert tortoises, suitable burrows, or other sign were observed during the field investigation. The land cover types supported by the project site provide neither suitable foraging habitat nor burrowing conditions for desert tortoise. Further, isolation by surrounding development and routine anthropogenic disturbance associated with existing land uses preclude desert tortoise from occurring on-site. Therefore, the project site was determined not to have potential to support desert tortoise. No further surveys are recommended.

Critical Habitat

Under the federal Endangered Species Act, “Critical Habitat” is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the United States Fish and Wildlife Service (USFWS) regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a Clean Water Act Permit from the United States Army Corps of Engineers [Corps]). If a there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The project site is not located within federally designated Critical Habitat. The nearest Critical Habitat designations to the site is located approximately 10.8 miles to the northwest for Cushenbury buckwheat (*Eriogonum ovalifolium* var. *vineum*) and Parish’s daisy (*Erigeron parishii*). Therefore, no impacts to federally designated Critical Habitat will occur from implementation of the proposed project.

Jurisdictional Waters

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Game Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

A query of the National Wetlands Database (NWI) database found no potential blueline streams, riverine, or other aquatic resources within or adjacent to the project site. During the field investigation, one (1) swale was observed traversing the northern boundary of the project site from west to east along the middle of Mane Street, a dirt access road. This feature is an erosional feature that only receives flows from direct precipitation during storm events and surface runoff from adjacent developed areas.

The project site does not support any discernible drainage courses, inundated areas, wetland features, or hydric soils that would be considered jurisdictional by the Corps, Regional Water Quality Control Board (Regional Board or RWQCB), or CDFW. Therefore, project activities will not result in impacts to Corps, Regional Board, or CDFW jurisdictional areas and regulatory approvals will not be required.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* –

Sensitive Biological Resources

Special Status Wildlife

A BRA survey was conducted by ELMT Consulting in March 2024 to identify potential habitat for special-status wildlife and habitats within the project area. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the project site to determine if the existing plant communities, at the time of the survey, have the potential to provide suitable habitat(s) for special-status plant and wildlife species. The literature search identified twenty-five (25) special-status plant species and ten (10) special-status wildlife species as having potential to occur within the Rimrock and Yucca Valley North USGS 7.5-minute quadrangles.

Based on habitat requirements for specific species and the availability and quality of onsite habitats, it was determined that the proposed project site has a low potential to support western burrowing owl (*Athene cunicularia*) and desert tortoise (*Gopherus agassizii*). It was further determined that the project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the vicinity of the site.

No burrowing owls or new signs thereof (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The land cover types supported by the site allow for line-of-sight observation favored by burrowing owls. However, no suitable burrows (>4 inches) for roosting and nesting were observed on- site. Further, routine anthropogenic disturbances associated with existing land uses preclude burrowing owl from occurring on-site. Therefore, the project site was determined not to have potential to support burrowing owl. No further surveys are recommended.

No live desert tortoises, suitable burrows, or other signs were observed during the field investigation. The land cover types supported by the project site provide neither suitable foraging habitat nor burrowing conditions for desert tortoise. Further, isolation by surrounding development and routine anthropogenic disturbance associated with existing land uses preclude desert tortoise from occurring on-site. Therefore, the project site was determined not to have potential to support desert tortoise. No further surveys are recommended.

Thus, impacts to special status wildlife are considered less than significant without the need for added mitigation.

Special Status Plant Communities

According to the CNDDB and CNPS, twenty-five (25) special-status plant species have been recorded in the Rimrock and Yucca Valley North quadrangles (refer to Attachment D of Appendix 2). The project site supports exclusively developed and highly disturbed land and no natural plant communities are supported within or adjacent to site boundaries. While western Joshua tree was observed on-site during the field investigation, based on habitat requirements for specific special-status plant species, it was determined that the project site does not have potential to support any of the other special-status plant species known to occur in the vicinity of the site and all are presumed to be absent.

The California Fish and Game Commission (Commission) designated the western Joshua tree as a candidate for listing under the California Endangered Species Act (CESA) in October 2020. The new law, which became effective July 1, streamlines the western Joshua tree take permit process and broadens the purposes for which a permit may be issued. A western Joshua tree may now be removed for any purpose, so long as a permit is obtained and the removal is fully mitigated, or alternatively, an in-lieu mitigation fee is paid. A total of six (6) western Joshua trees measuring between 1 and 5 meters in height were observed on the northern boundary of the project site along Mane Street in accordance with western Joshua tree protocols. These western Joshua trees are shown overlaid on the site plan in **Figure IV-2**. No western Joshua trees are expected to be directly impacted by project implementation, and they will be protected in place. The project would be developed within 50 feet of the mapped western Joshua trees, and thus, mitigation is necessary to ensure their protection during construction. However, to protect the trees during construction, **MMs BIO-1 through BIO-3** shall be implemented.

No special-status plant communities were identified as occurring in the Rimrock and Yucca Valley North quadrangles and no special-status plant communities were observed during the field investigation. Therefore, no special-status plant communities will be impacted by project implementation.

Impact Conclusion

No special-status wildlife species were observed on-site during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed project site does not have a potential to support burrowing owl or desert tortoise. It was further determined that the project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the vicinity of the site. As the proposed project site contains 6 western Joshua trees, mitigation to protect the trees in place is

necessary to minimize impacts to this species **MMs BIO-1 through BIO-3**. Thus, the proposed project would have a less than significant potential to 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 through the implementation of mitigation.

b. *Less Than Significant Impact* – The project site is not located within federally designated Critical Habitat. The nearest Critical Habitat designations to the site is located approximately 10.8 miles to the northwest for Cushenbury buckwheat (*Eriogonum ovalifolium* var. *vineum*) and Parish's daisy (*Erigeron parishii*). Therefore, no impacts to federally designated Critical Habitat will occur from implementation of the proposed project. Thus, impacts are less than significant.

c. *No Impact* – The project site does not support any discernible drainage courses, inundated areas, wetland features, or hydric soils that would be considered jurisdictional by the Corps, Regional Board, or CDFW. A query of the NWI database found no potential blueline streams, riverine, or other aquatic resources within or adjacent to the project site. Therefore, project activities will not result in impacts to Corps, Regional Board, or CDFW jurisdictional areas and regulatory approvals will not be required and thus, the proposed project would have no potential to have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d. *Less Than Significant With Mitigation Incorporated* – The site was not identified as occurring within or adjacent to a recognized wildlife corridor. According to the San Bernardino County Countywide Plan, the nearest major open space area to the site is located approximately 9.8 miles to the northwest within the San Bernardino Mountains. In addition, the Open Space Element identifies Wilderness Areas as occurring approximately 5.6 miles to the northwest. The proposed project will be confined to existing areas that have been heavily disturbed or developed and are isolated from regional wildlife corridors and linkages. In addition, there are no riparian corridors, creeks, or useful patches of steppingstone habitat (natural areas) within or connecting the site to a recognized wildlife corridor or linkage. As such, the project site and off-site street improvement areas are not expected to contribute to local wildlife movement opportunities and no impacts to wildlife corridors or linkages will occur from project implementation.

However, nesting birds are protected pursuant to the MBTA and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). A pre-construction clearance survey for nesting birds shall be conducted within three (3) days (72-hours) of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. A pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance. Thus, with implementation of **MM BIO-4**, any effects on migratory birds, wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

e. *Less Than Significant Impact* – Certain desert plant species (i.e., smoke trees, cacti, Mojave yuccas [*Yucca schidigera*]) are regulated pursuant to Section 88.01.060 of the San Bernardino County Development Code and Section 80073 of the California Desert Native Plant Act. Therefore, impacts

to these species should be avoided in all instances. In the event that avoidance is not feasible, the project applicant will be required to obtain a Tree or Plant Removal Permit from the County, prior to removal of any regulated tree or plant. However, it is anticipated that, due to the site design and absence of most protected species except the western Joshua tree, the proposed project will avoid impacting desert plant species that require permit for removal from the County. Thus, through compliance with the County Development Code and Desert Plant removal permitting therein, the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. *No Impact* – The BRA provided as **Appendix 2** concluded that the project site is not located in an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the proposed project would therefore not result in a significant impact to any such plans. No mitigation is required.

Mitigation Program

BIO-1 Construction fencing 4" or higher shall be installed around western Joshua Trees a minimum of 1' around the trees that are within 50 feet of construction activities, unless a tree is located on a neighboring property and there is an existing fence between the neighboring property. Fencing shall be maintained throughout construction and shall be removed at the conclusion of construction. Signs shall be posted at each tree indicating protection of the trees.

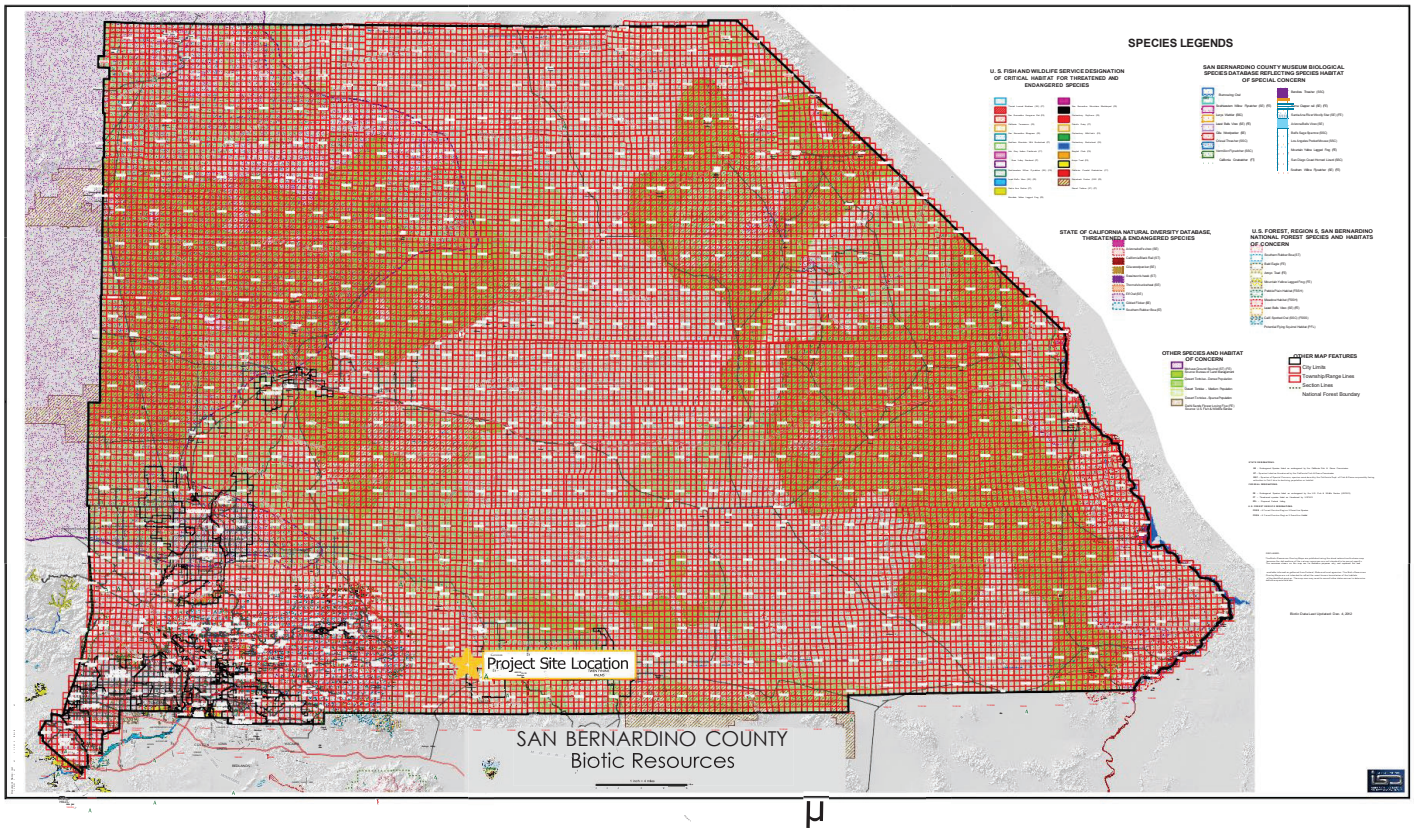
BIO-2 Heavy construction equipment shall not be operated or stored within the western Joshua tree protection area delineated by the construction fencing required by MM BIO-1, unless a tree is located on a neighboring property and there is an existing fence between the neighboring property. Construction equipment and materials shall be stored at least 50 feet from any western Joshua tree and to protect the tree's root zone, no trenching, removal, or addition of soil shall occur within this same buffer.

BIO-3 The western Joshua tree is a candidate threatened species under the California Endangered Species Act. Prior to the initiation of western Joshua tree removal, relocation, replanting, trimming, or pruning or any activity that may result in take of WJT, the Developer shall obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081b of the CESA, or under the Western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927- 1927.12). California Fish and Game Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". Mitigation for CESA will occur at a minimum 1:1 or per the stem count per the WJTCA census in lieu fee.

BIO-4 Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of

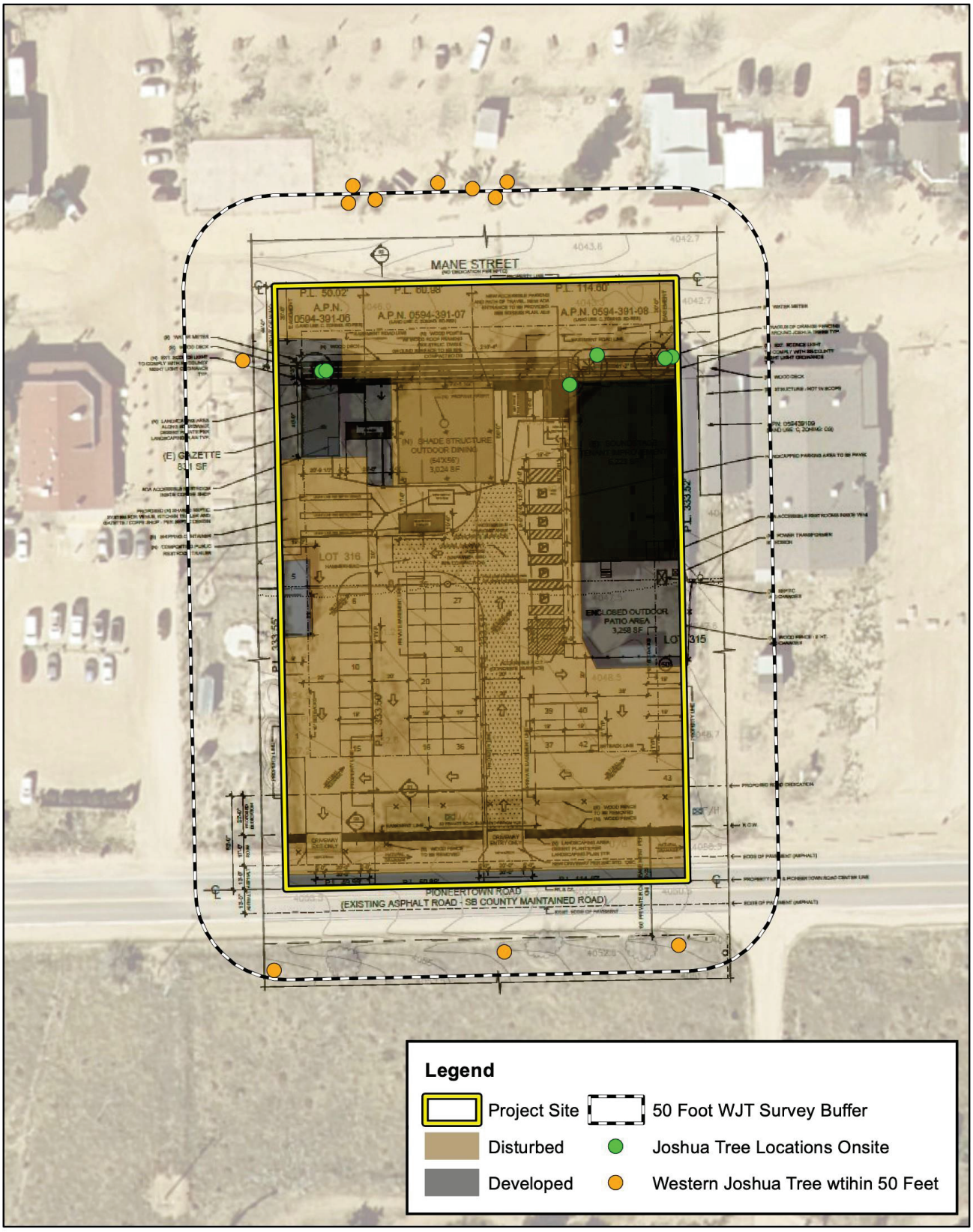
nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined whether the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measures.



Tom Dodson & Associates
Environmental Consultants

FIGURE IV-1
Biotic Resources Map



PIONEERTOWN SOUNDSTAGE PROJECT

Vegetation

FIGURE IV-2

Tom Dodson & Associates
Environmental Consultants

Vegetation Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

V. CULTURAL RESOURCES

SUBSTANTIATION: Check if project is located in the Archaeological ☐ or Paleontological ☐ Resources overlays or cite results of cultural resource review) The information utilized in this section of the Initial Study was obtained from the following technical study: "*Cultural Resources Assessment Pioneertown Mane Street Preservation and Improvement Plan Project Pioneertown, Unincorporated San Bernardino County, California*" prepared by BCR Consulting LLC dated July 24, 2024 (**Appendix 3a**). Additionally, a "*Historic Building Study and CEQA-Compliance Analysis Pioneertown Gazette and Soundstage Buildings, 53563 and 53585 Mane Street Pioneertown, San Bernardino County, California Conditional Use Permit Application No. 2022-00191"* was prepared by CRM TECH for the proposed project, dated June 27, 2025 (**Appendix 3b**)

Background

BCR Consulting LLC (BCR Consulting) completed a Cultural Resources Assessment of the project. A cultural resources records search, pedestrian field survey, Sacred Lands File Search through the Native American Heritage Commission, and vertebrate paleontological resources assessment were conducted for the project in partial fulfillment of the California Environmental Quality Act (CEQA).

The records search revealed that three cultural resource studies have taken place resulting in the recording of five cultural resources within one mile of the project site. One previous study has assessed the project site resulting in one cultural resource (the Pioneertown Mane Street Historic District designated P-36-25903) within which the project site is located. During the research and field survey, BCR Consulting archaeologists identified two previously recorded contributing elements (the Pioneertown Gazette building and the Silver Dollar building [currently known as the Pioneertown Soundstage]) to the existing district (P-36-25903) within the project site and recorded them on California Department of Park and Recreation (DPR) 523 forms. This district was listed on the National Register of Historic Places (the National Register) in 2020, which means that it is automatically listed on the California Register of Historical Resources (the California Register), making it a Historical Resource under CEQA.

Because the Pioneertown Mane Street Historic District is a Historic Property and a Historical Resource, any

proposed project activities should be consistent with "plans for rehabilitation to ensure that the undertaking maintains consistency with the Secretary of the Interior Standards for the Treatment of Historic Properties" (36 CFR part 68). The Standards are intended to pertain to rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility. Project design must be carried out in consultation with a professional that meets the U.S. Secretary of the Interior Professional Qualification Standards for Historic Architecture (National Park Service 2024).

Preservation in place is the preferred manner of mitigating impacts to historical resources under CEQA. Where preservation and rehabilitation (as described above) are not an option, a data collection mitigation program has been developed in which potential adverse effects of any proposed demolition would be reduced.

If significant adverse effects are unavoidable, prior to any project-related impacts to significant resources, the County would complete or require the completion of Historic American Building Survey (HABS) style photographic documentation of the subject property. While the photographs would meet HABS standards, only local curation (and no federal curation or involvement) would be necessary. The photographic documentation will be provided to the County (and any required local repositories) for curation. However:

> In most cases the use of drawings, photographs, and/or displays does not mitigate the physical impact on the environment caused by demolition or destruction of an historical resource (14 CCR § 15126.4(b)). However, CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance. In this context, recordation serves a legitimate archival purpose. The level of documentation required as a mitigation should be proportionate with the level of significance of the resource (California State Parks 2024).

The current project proposes the preservation of the district contributors (the Silver Dollar building-also known as the Pioneertown Soundstage, and the Pioneertown Gazette building), although minor components may be subject to alteration. The appropriate application of the recommendations and mitigations as stated are anticipated to reduce impacts to the Pioneertown Mane Street Historic District below a significant level. This is further demonstrated by the conclusions made in **Appendix 3b**, which concluded that if the project is designed and implemented in accordance with these recommendations and guidelines, it will not cause a substantial adverse change in the significance of this "historical resource. The recommendations presented therein are as follows:

Project components involving the Pioneertown Gazette building are nearly entirely confined to the interior except for the installation of a wood plank decking adjacent to the front of the building. This change, as proposed, will recreate an original feature and essentially enhance the historical character of the building (Fig. 6). In fact, the other recent modifications to the building, such as removal of the synthetic siding in favor of wood board cladding and restoration of early signage, incorporate several of the character-defining features noted above in a manner consistent to the Secretary of the Interior's Standards for the rehabilitation of historic buildings. The proposed additional improvement of a wood plank deck will not constitute an adverse change to this historical resource.

Similarly, the planned exterior alterations to the Pioneertown Soundstage, namely the enclosed outdoor patio extension from the southern side and the ADA reserved parking and access ramp, will not in and of

themselves impose any significant physical impact to the building or cause a substantial alteration to its current appearance, especially in the primary façade. As auxiliary features, they present relatively minor and unintrusive modifications and can be easily reversed if necessary. Nevertheless, these project components should be designed with sensitivity to the building's historical character and integrity to ensure consistency with the Secretary of the Interior's Standards. In particular, the standards for rehabilitation provide the following guidelines for any projects that may require exterior renovation and/or modification of a significant historic building (Morton et al. 1997:vi-vii):

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Regarding the property treatment of historic buildings during "work that must be done to meet accessibility and life-safety requirements," guidelines for implementing the Secretary of the Interior's Standards offer the following recommendations (Weeks and Grimmer 2017:69):

- Identifying the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work.
- Complying with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.

- Working with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a historic building, its site, and setting.
- Providing barrier-free access that promotes independence for the user while preserving significant historic features.
- Finding solutions to meet accessibility requirements that minimize the impact of any necessary alteration for accessibility on the historic building, its site, or setting, such as compatible ramps, paths, and lifts.

No other cultural resources or sensitivity were identified during the research and fieldwork. Generally, if previously undocumented cultural resources are identified during earthmoving activities associated with development of the project site, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary. Further, findings were negative during the Sacred Lands File search with the NAHC.

If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Because the Pioneertown Mane Street Historic District is a Historic Property and a Historical Resource, the proposed project is required to be consistent with “plans for rehabilitation to ensure that the undertaking maintains consistency with the Secretary of the Interior Standards for the Treatment of Historic Properties.”[5] Thus, **MM CUL-1** would be implemented to ensure that the standards for developing the proposed project align with the Secretary of Interior Standards, thereby ensuring that the proposed project preserves the historic nature of the structures on site, and thereby would not substantially alter a historic property such that a significant scenic impact would result. Further, the recommendations found in **Appendix 3b,** which are outlined under Background, above, and are found on pages 10-11 on **Appendix 3b**, detail the manner in which the project modifications to historical structures shall be carried out in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 67, 68). **MM CUL-1** would further require the enforcement of the recommendations found in **Appendix 3b** as part of the County’s review and approval of the project design.

[5] 36 CFR part 68; see https://www.nps.gov/orgs/1739/index.htm (accessed 06/19/25)

In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the project:

- Historical resources within the project area would be modified and rehabilitated to Secretary of the Interior Standards to avoid significant environmental effects. This requirement shall be enforced through the implementation of **MM CUL-1.** Thus, the project as currently proposed will not cause a substantial adverse change to any known historical resources.
- No further historical resources investigation is necessary for the proposed project unless construction plans undergo such changes as to include areas not covered by the Cultural Resources Assessment and Historic Building Study prepared for the project (**Appendices 3a and 3b)**.

Thus, through the implementation of mitigation, the potential for impact to historical resources will be reduced to a less than significant level.

b. *Less Than Significant With Mitigation Incorporated* – Per the discussion contained in **Appendix 3a**, no archaeological sites or isolates were found to be located within the project boundaries during the field review of the project area. Further, the records search undertaken for the proposed project did not reveal any archaeological findings that would be impacted by project implementation. Thus, no such resources require further consideration.

In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the project:

- No archaeological resources are known to occur within the project site, however, if potentially significant archaeological materials are encountered during construction, all work should be halted in the vicinity of the discovery until a qualified archaeologist can assess the significance and integrity of the find through the implementation of **MM CUL-2.**
- No further cultural resources investigation is necessary for the proposed project unless construction plans undergo such changes as to include areas not covered by the Cultural Resources Assessment and Historic Building Study prepared for the project (**Appendices 3a and 3b)**.
- The above conclusions are dependent on Native American Consultation, which the County has conducted with no requests from any Tribe to consult. Based on the feedback from the Tribes, no known tribal resources exist within the project site, and as a result, no impacts thereof are anticipated.

However, if potentially significant archaeological materials are encountered during construction, all work should be halted in the vicinity of the discovery until a qualified archaeologist can assess the significance and integrity of the find. Furthermore, the archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures to ensure that impacts to archaeological resources would be minimized to a level of less than significant. This shall be enforced through the implementation of **MM CUL-2.** Thus, through the implementation of mitigation, the potential for impact to archaeological resources will be reduced to a less than significant level.

c. *Less Than Significant Impact* – As noted in the discussion above, no available information suggests that human remains may occur within the Area of Potential Effect (APE) and the potential for such an occurrence is considered low. Human remains discovered during the project will need to be treated in accordance with the provisions of Health and Safety Code (HSC) §7050.5 and PRC §5097.98, which is mandatory. State law (Section 7050.5 of the HSC) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered adequate mitigation for potential impacts and no further mitigation is required.

Mitigation Program

CUL-1 The proposed project shall be designed to be consistent with the plans for rehabilitation to ensure that the undertaking maintains consistency with the "Secretary of the Interior Standards for the Treatment of Historic Properties" (36 CFR part 68; see http://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm).

Further, the recommendations presented in CRM TECH's Historic Building Study and CEQA-Compliance Analysis (Appendix 3b) shall be enforced and incorporated into the project design. These are:

1. **A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**
2. **The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**
3. **Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.**
4. **Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.**
5. **Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.**
6. **Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**
7. **Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.**
8. **Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.**
9. **New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated**

from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Regarding the property treatment of historic buildings during "work that must be done to meet accessibility and life-safety requirements," guidelines for implementing the Secretary of the Interior's Standards offer the following recommendations that shall be implemented by the Developer of the project (Weeks and Grimmer 2017:69):

- **Identify the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work.**
- **Comply with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.**
- **Work with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a historic building, its site, and setting.**
- **Provide barrier-free access that promotes independence for the user while preserving significant historic features.**
- **Find solutions to meet accessibility requirements that minimize the impact of any necessary alteration for accessibility on the historic building, its site, or setting, such as compatible ramps, paths, and lifts.**

CUL-2 Should any cultural resources be encountered during construction of the project, earthmoving or grading activities in the immediate area of the finds shall be halted and an on-site inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the on-site archaeological professional, who is acceptable to the County and retained by the Applicant. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measures.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

VI. ENERGY

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The proposed project consists of rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking.

Energy consumption encompasses many different activities. For example, construction can include the following activities: delivery of equipment and material to a site from some location (note it also requires energy to manufacture the equipment and material, such as harvesting, cutting and delivering wood from its source); employee trips to work, possibly offsite for lunch (or a visit by a catering truck), travel home, and occasionally leaving a site for an appointment or checking another job; use of equipment onsite (electric or fuel); and sometimes demolition and disposal of construction waste. During construction, the proposed project will utilize construction equipment that is CARB approved, minimizing emissions generated and electricity required to the extent feasible (as outlined under Section III, Air Quality, above). Equipment not in use for 5 minutes must be turned off, and electrical construction equipment must be used where available. This standard requirement would prevent a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARB regulations regarding energy efficiency. Furthermore, the project is required to comply with CARB Rule 2485 (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. The project would comply with existing regulations requiring recycling of construction debris from demolition of the onsite structures. Compliance with these existing regulations would prevent a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARB regulations regarding energy efficiency. These requirements are consistent with State and regional rules and regulations.

Additionally, operation of construction equipment would be regulated per the In-Use Off-Road Diesel Vehicle Regulation administered by CARB. The In-Use Off-Road Diesel Vehicle Regulation is

intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. Compliance with this regulation would also ensure that off-road diesel-powered vehicles would consume less fuel and more efficiently combust fuel. In addition to off-road regulations, the California Environmental Protection Agency (Cal/EPA) establishes stringent on-road emissions standards for heavy-duty engines, though enforcing emissions standards that promote fuel efficiency. These standards are continually evolving to result in more effective technology and more stringent standards, which reduce reliance on fossil. The development of the proposed project would be required to comply with Title 24, Part 6, of the CCR (the CALGreen Code), which would help to ensure that energy efficient equipment is utilized. As the proposed project would be required to comply with these standards and regulations, under the construction scenario outlined in the Project Description, the proposed project would not result in a significant increase in demand on regional energy supplies or require additional capacity from local or regional energy suppliers.

The proposed project will be supplied with electricity by Southern California Edison (SCE) through the existing electrical connection located within the site. SCE will be able to continue to supply sufficient electricity. No connection to natural gas would be necessary. Energy use associated with project occupancy would be typical of a commercial use, and the project would be required to comply with the most recently adopted California Energy Code, and as part of the utilization and rehabilitation of the historic structures on site, would upgrade the existing electrical panel by installing a new electrical panel to meet the CBC and Fire Code, thus further reducing the demand for electricity that would be obtained from SCE's mix of electricity sources as a result of energy demanded by project occupancy. Additionally, the project would be developed with Energy Star-rated appliances, and other energy efficient systems, including the HVAC systems. The most recently adopted CALGreen Code also requires water efficient landscaping and irrigation, to which project development will adhere.

Other energy demanding activities associated with project occupancy would include landscape maintenance, consumption of fuel from non-electric vehicle trips, consumption of electricity from electric-vehicle trips, etc. The developer would not have control over what types of vehicles visit the site over the life of the project, but the trend for greater fuel efficiency in on-road vehicles that has occurred as a result of California's Clean Vehicle Standards suggest that long-term transportation fuel consumption from project occupancy would steadily decline over time, thus ensuring that vehicle fuel consumption is not wasteful or inefficient.

The proposed project must be constructed in conformance with a variety of existing energy efficiency regulatory requirements or guidelines including:

- Compliance with Title Chapter 6 of the California Code of Regulations with respect to energy efficiency standards for new building construction.
- Both federally and non-federally regulated appliances shall abide by the efficiency standards of Title 20, Section 1601 et seq. of the California Code of Regulations.
- Compliance with the most recently adopted CALGreen Code (Title 24, Part 11). The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing

the design and construction of building through the use of building concepts encouraging sustainable construction practices.

- The provisions of the CALGreen Code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building.
- Compliance with the Building Energy Efficiency Standards (CBSC) would ensure that the building energy use associated with the proposed project would not be wasteful or unnecessary.
- Compliance with Indoor Water use consumption reduced through the maximum fixture water use rates.
- Compliance with diversion of construction and demolition materials from landfills.
- Compliance with MDAQMD Mandatory use of low-pollutant emitting finish materials.
- Compliance with MDAQMD Rules 431.1 and 431.2 to reduce the release of undesirable emissions.
- Compliance with diesel exhaust emissions from diesel vehicles and off-road diesel vehicle/equipment operations.

Compliance with these regulatory requirements for operational energy use and construction energy use would not be wasteful or unnecessary use of energy. Further, SCE is presently in compliance with State renewable energy supply requirements. Under the operational scenario for the proposed project, the proposed project will have a less than significant potential to result in wasteful, inefficient, or unnecessary energy consumption that could result in a significant adverse impact to energy issues based on compliance with the referenced laws, regulations and guidelines. No mitigation is required.

b. *Less Than Significant Impact* – The project's consistency with the applicable state and local plans is discussed below.

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the project site is provided by the local and regional roadway systems. The project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because Southern California Association of Governments (SCAG) is not planning for intermodal facilities on or through the project site.

Consistency with the Transportation Equity Act for the 21st Century (TEA-21)

The project site is located near major transportation corridors, including Pioneertown Road, which connects to Highway 62, and therefore has proximate access to the Highway system. The site selected for the project facilitates access and acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses, particularly as the proposed project would expand the existing site use, rather than creating a new site use. The project supports the strong planning processes emphasized under TEA-21. The project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Consistency with Integrated Energy Policy Report (IEPR)

Electricity for the project would be provided by SCE. SCE's Clean Power and Electrification Pathway white paper builds on existing State programs and policies. As such, the project is consistent with, and would not otherwise interfere with, nor obstruct implementation of the goals presented in the IEPR.

Consistency with State of California Energy Plan

The project site is located proximate to transportation corridors, including Pioneertown Road, which connects to Highway 62, and therefore has proximate access to the highway system. The site selected for the project is infill and facilitates access and takes advantage of existing infrastructure systems, including those that presently serve the project. Further the proposed project would upgrade the existing electrical infrastructure through the installation of a new electrical panel that would be installed to meet the CBC and Fire Codes. The project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2022 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2023. It should be noted that the analysis herein assumes compliance with the 2022 or most recently adopted Title 24 Standards, which may include the 2025 version, which is slated to become effective on January 1, 2026.

Consistency with AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493 is not applicable to the project as it is a Statewide measure establishing vehicle emissions standards. No feature of the project would interfere with implementation of the requirements under AB 1493.

Consistency with California's Renewable Portfolio Standard (RPS)

California's Renewable Portfolio Standard is not applicable to the project as it is a Statewide measure that establishes a renewable energy mix. No feature of the project would interfere with implementation of the requirements under RPS.

Consistency with the Clean Energy and Pollution Reduction Act of 2015 (SB 350)

The proposed project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the project would interfere with implementation of SB 350. Additionally, the project would be designed and constructed to implement the energy efficiency measures—such as through reducing outdoor water use through water efficient design, meeting Title 24/CALGreen requirements for building efficiency, installing a new electrical panel to meet the CBC and Fire Codes, utilization of low flow indoor fixtures, and installation of energy efficient appliances—for new commercial developments and would include several measures designed to reduce energy consumption as described above.

Conclusion

As shown above, the project would not conflict with any of the State or local plans. As such, the proposed project would have a less than significant potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND SOILS: Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
(iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where RWs are not available for the disposal of wastewater?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

VII. GEOLOGY AND SOILS

SUBSTANTIATION: (Check ☐ if project is located in the Geologic Hazards Overlay District). The information utilized in this section of the Initial Study was obtained from the following technical study: "*Cultural Resources Assessment Pioneertown Mane Street Preservation and Improvement Plan Project Pioneertown, Unincorporated San Bernardino County, California*" prepared by BCR Consulting LLC dated July 24, 2024 (**Appendix 3a**).

Impact Analysis

a. Ground Rupture

Less Than Significant Impact – The project site is located in the Desert Region of the County within the community of Pioneertown, which is located in a highly seismically active area. The project site is located approximately 4 miles to the north of the Pinto Mountain Fault Zone system, which is classified as an Alquist-Priolo Special Study Zone under the Alquist-Priolo Earthquake Fault Zoning Act (**Figure VII-1**). **Figure VII-1** shows where these faults are located as indicated by the Department of Conservation. Additionally, faults and fault zones are delineated on **Figure VII-2**, the San Bernardino Countywide Plan Earthquake Fault Zones Map. As shown, the closest known active fault zones are more than 4 miles from the proposed project site. As such, the site is not located within an Alquist-Priolo Special Study Zone. Based on this information, the risk for ground rupture at the site location is low; therefore, it is not likely that future visitors and employees of the project will be subject to rupture from a known earthquake fault. Therefore, any impacts under this issue are considered less than significant; no mitigation is required.

b. Strong Seismic Ground Shaking

Less Than Significant Impact – As stated in the discussion above, several faults run through this portion of the County as shown on **Figures VII-1 and VII-2**. As with much of southern California, the proposed structures will be subject to strong seismic ground shaking impacts should any major earthquakes occur in the future. Any future developments at the project site should anticipate that moderate to large seismic events could occur near the site. The project site has a moderate earthquake shaking potential. As a result, and like all other development projects in the County and throughout the Southern California Region, the proposed project will be developed in accordance with the applicable development code, the current California Building Code (CBC), and County Development Code. This will ensure that structural integrity will be maintained in the event of an earthquake, and as such, impacts associated with seismic ground shaking will be less than significant.

c. Seismic-Related Ground Failure Including Liquefaction

No Impact – The San Bernardino Countywide Plan Environmental Impact Report, Chapter 5, Geology & Soils (Page 5.6-15), indicates that, in the Desert Regions, liquefaction is most likely to occur in areas of alluvial deposits with relatively shallow groundwater or around dry lakebeds, along the Mojave River, and areas adjacent to faults that form groundwater barriers. According to the map prepared for the San Bernardino Countywide Plan Liquefaction & Landslides Map (**Figure VII-3**), the project site is not mapped within an area that is considered susceptible to liquefaction. As the proposed project is not located in any of the aforementioned areas, it is not anticipated that the proposed project would be susceptible to seismic-related ground failure, including liquefaction. No impacts are anticipated and no mitigation is required.

d.iv. Landslides

No Impact – The project site is located in a flat area and is therefore not located in an area in which landslides are anticipated to occur. According to the map prepared for the San Bernardino

Countywide Plan Liquefaction & Landslides Map (**Figure VII-3**), the project site is not mapped within an area that is considered susceptible to landslides. Therefore, the project will not expose people or structures to potential substantial adverse landslide effects, including the risk of loss, injury, or death involving landslides. No impacts under this issue are anticipated and no mitigation is required.

b. *Less Than Significant Impact* – Project construction will not include any mass grading at the site, as the proposed project would utilize existing structures onsite, with the only new structures being mobile restroom, kitchen, and kiosk structures. The standard parking area will be surface graded, and the entryway access road will be compacted and covered with gravel; and if fugitive dust is observed, the remainder of the access road and parking will be covered with compacted gravel, sprayed with water, or the Applicant will utilize other means of dust minimization. Surface grading is anticipated to only result in minor losses of topsoil or erosion. Furthermore, the County Development Code Chapter 85.11.030 requires standard erosion control practices (Best Management Practices [BMPs]) to be implemented for all construction, which would ensure that the project would not result in substantial soil erosion or the loss of topsoil. Therefore, any impacts under this issue are considered less than significant.

c. *Less Than Significant Impact* – As previously stated, according to the San Bernardino Countywide Plan EIR, the potential for liquefaction to occur within the project site is low. Additionally, the potential for landslide at the project site has been determined to be minimal based on the flat topography of the site, and the distance from area mountains and hillsides. The San Bernardino Countywide Plan EIR indicates that subsidence due to groundwater extraction affects the Desert Regions, particularly near dry lakebeds in the Mojave and Morongo basins. Areas at high risk of future subsidence include the El Mirage Valley, Lower Mojave, Harper Valley, and Lucerne Valley. Areas at medium-high risk include the Upper Mojave River, Irwin Subbasin, Fremont Valley, and Twentynine Palms. The proposed project has been mapped as being located in an area that has medium to low subsidence potential by the San Bernardino Countywide Plan EIR (**Figure VII-3**). Thus, as the proposed project would only include the improvement of existing structures, which would be subject to the current CBC standards in addition to County Development Code requirements, the project would have a less than significant potential to 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 subsidence.

According to the San Bernardino Countywide Plan EIR, the Desert Region have the highest potential for collapsible soils due to their aridity, the prevalence of both alluvial and wind-deposited soils, and soils with salts. As previously stated, project construction will not include any mass grading at the site, as no new habitable structures will be installed. The standard parking area will be surface graded, and the entryway access road will be compacted and covered with gravel; and, if fugitive dust is observed, the remainder of the access road and parking will be covered with compacted gravel, sprayed with water, or the Applicant will utilize other means of dust minimization. Thus, as only surface grading would be required for the access road and driveway, and existing structures onsite would limit scope and scale of ground disturbance during construction, the potential for a significant impact to occur as a result of collapse at the project site would be less than significant. Based on the above discussion, it is not anticipated that the project will 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. No further mitigation is required.

d. *Less Than Significant Impact* – The proposed project is located within the community of Pioneertown and according to the United States Department of Agriculture (USDA) Web Soil Survey, soils underlying the project site have not been mapped in detail, but the surrounding area is mapped as being underlain by Nebona-Mirage-Joshua-Cajon soil complex. This soil series is not considered to contain expansive properties, as these soils do not contain a high percentage of clay. The San Bernardino Countywide Plan EIR Chapter 5, Geology & Soils, indicates that much of the Desert Region has low to moderately expansive soils. In select areas, such as Lucerne Valley and dry lakebeds, the soils can be highly expansive. This proposed project site is not located on a dry lakebed. Thus, it is anticipated that the expansion potential is low. Furthermore, as USDA soil maps do not indicate that any clay type soils are present in the project area, the development of the project will not create a substantial risk to life or property by being placed on expansive soils. Thus, impacts under this issue are considered less than significant. No further mitigation is required.

e. *Less Than Significant Impact* – The proposed project would abate an existing septic system and install a new septic system to accommodate wastewater from the proposed Pioneertown Soundstage Project. The new septic tank system will be capable of handling about 2,000 gallons of waste per day and will be developed in accordance with current California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards, which sets parameters for private sewage disposal, and in compliance with the County Development Code, Article 6.

As previously stated, the proposed project is supported by stable soils (soils in the greater area are underlain by a Nebona-Mirage-Joshua-Cajon soil series, which series consists of shallow to deep, well drained soils that formed in mixed alluvium).[6,7] Furthermore, these soils are somewhat excessively drained, with negligible to low runoff, and rapid permeability, which demonstrates the stability of these soils.[8] Based on the nearly exclusive use of septic tanks or other alternative wastewater systems within the area (no municipal wastewater collection or treatment systems exist in the project vicinity), the soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Through compliance with the current California Plumbing Code (Part 5, Title 24, California Code of Regulations), any impacts under this issue are considered less than significant. No mitigation is required.

f. *No Impact* – The San Bernardino Countywide Plan for indicates that the proposed project area is not located within a delineated sensitivity area for paleontological resources (refer to **Figure VII-4**). However, the Cultural Resources Assessment (**Appendix 3b**) evaluated the potential for paleontological resources to exist within the project site at the site-specific level, and determined that, the majority of the project is underlain by Pleistocene-aged gravel and sand (Dibblee and Minch 2008). Pleistocene units are considered to be highly paleontologically sensitive. Western Science Center does not have localities within the project area or within a 1-mile radius, but does have

[6] USDA, 2025. Mirage Series. https://soilseries.sc.egov.usda.gov/OSD_Docs/M/MIRAGE.html (Accessed 03/25/25)
[7] USDA, 2025. Nebona Series. https://soilseries.sc.egov.usda.gov/OSD_Docs/N/NEBONA.html (Accessed 03/25/25)
[8] National Cooperative Soil Survey, 2023. Cajon Series. https://soilseries.sc.egov.usda.gov/OSD_Docs/C/CAJON.html (Accessed 03/25/25)

localities within similarly mapped units in Southern California. Any fossil specimen from the Pioneertown Soundstage Project would be scientifically significant. Excavation activity associated with the development of the project area would impact the paleontologically sensitive Pleistocene alluvial units, and it is the recommendation of the Western Science Center that a paleontological resource mitigation program be put in place to monitor, salvage, and curate any recovered fossils associated with the study area. As a result, **MM GEO-1** shall be implemented to ensure that the paleontological resource mitigation program is implemented to ensure impacts to such resources are minimized to a level of less than significant. Therefore, as the proposed project is underlain by geologic formations that are supportive of paleontological resources, even though excavation associated with project development is minimal in support of the development of the septic tank onsite, the proposed project would, with the implementation of mitigation, have a less than significant potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Mitigation Program

GEO-1 All mass grading, excavation, drilling, and trenching activities within the site, shall be monitored part-time for paleontological resources, on an as-needed basis, as determined by the project paleontologist. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the paleontologist of record, representatives of the grading contractor and subcontractors, the project owner or developer, and a representative of the lead agency. The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials. A qualified paleontologist shall monitor earth disturbance activities for potential paleontological resource and shall have the authority and responsibility to halt or divert grading operations. The paleontological principal investigator shall notify the County of any fossil discoveries by email and/or phone call. The monitor shall be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must have the power to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.

Collected samples of sediment shall be processed to recover small fossils, and all recovered specimens shall be identified and curated at a repository with permanent retrievable storage.

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the procedures outlined above. The report shall include a discussion of the significance of the paleontological findings, if any. The report and the inventory, when approved by San Bernardino County, would signify completion of the program to mitigate potential impacts on paleontological resources. Under these conditions, the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measure.

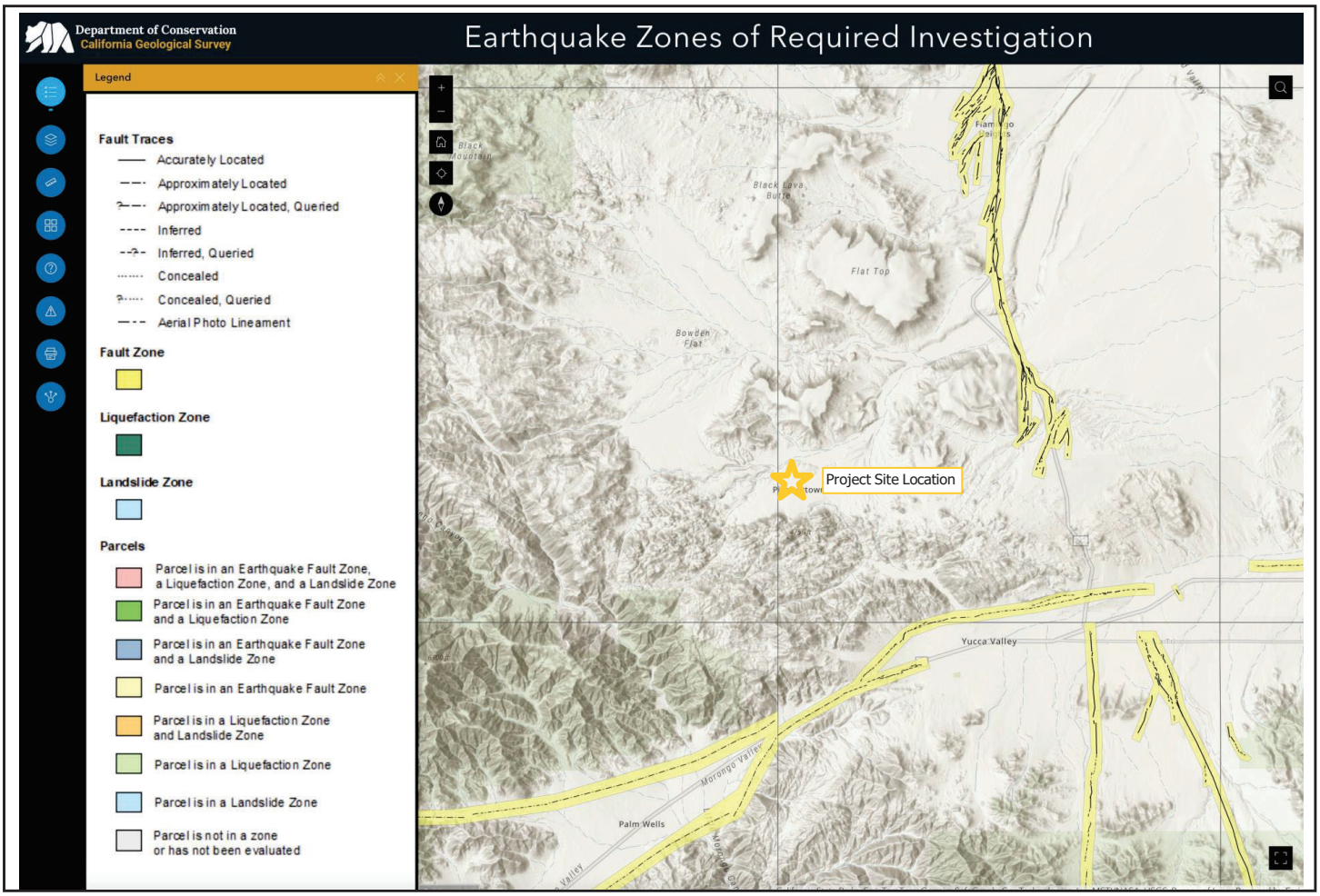


FIGURE VII-1

Tom Dodson & Associates *Environmental Consultants*	Earthquake Zones of Requires Investigation

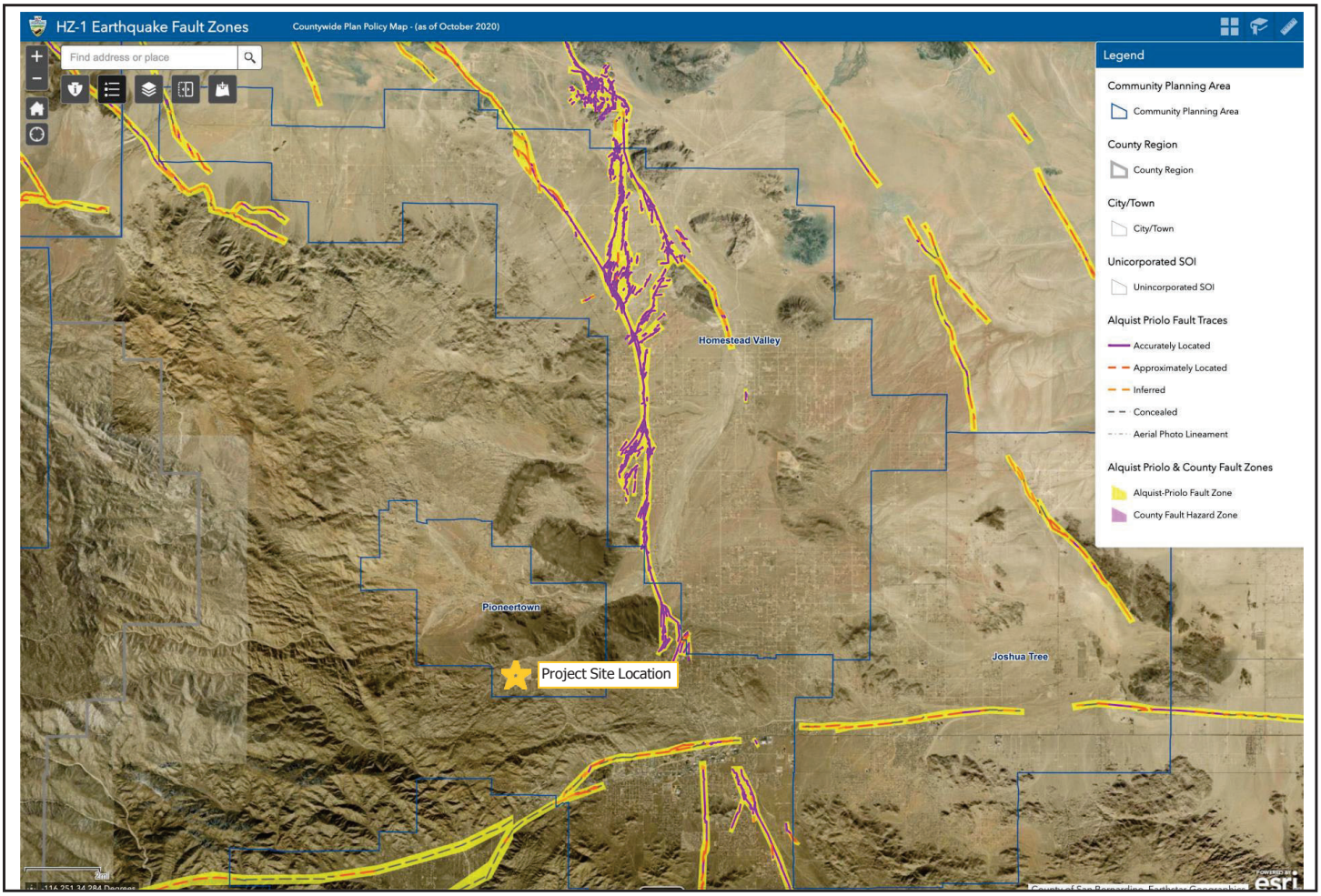


FIGURE VII-2

Tom Dodson & Associates
Environmental Consultants

Earthquake Fault Zones Map

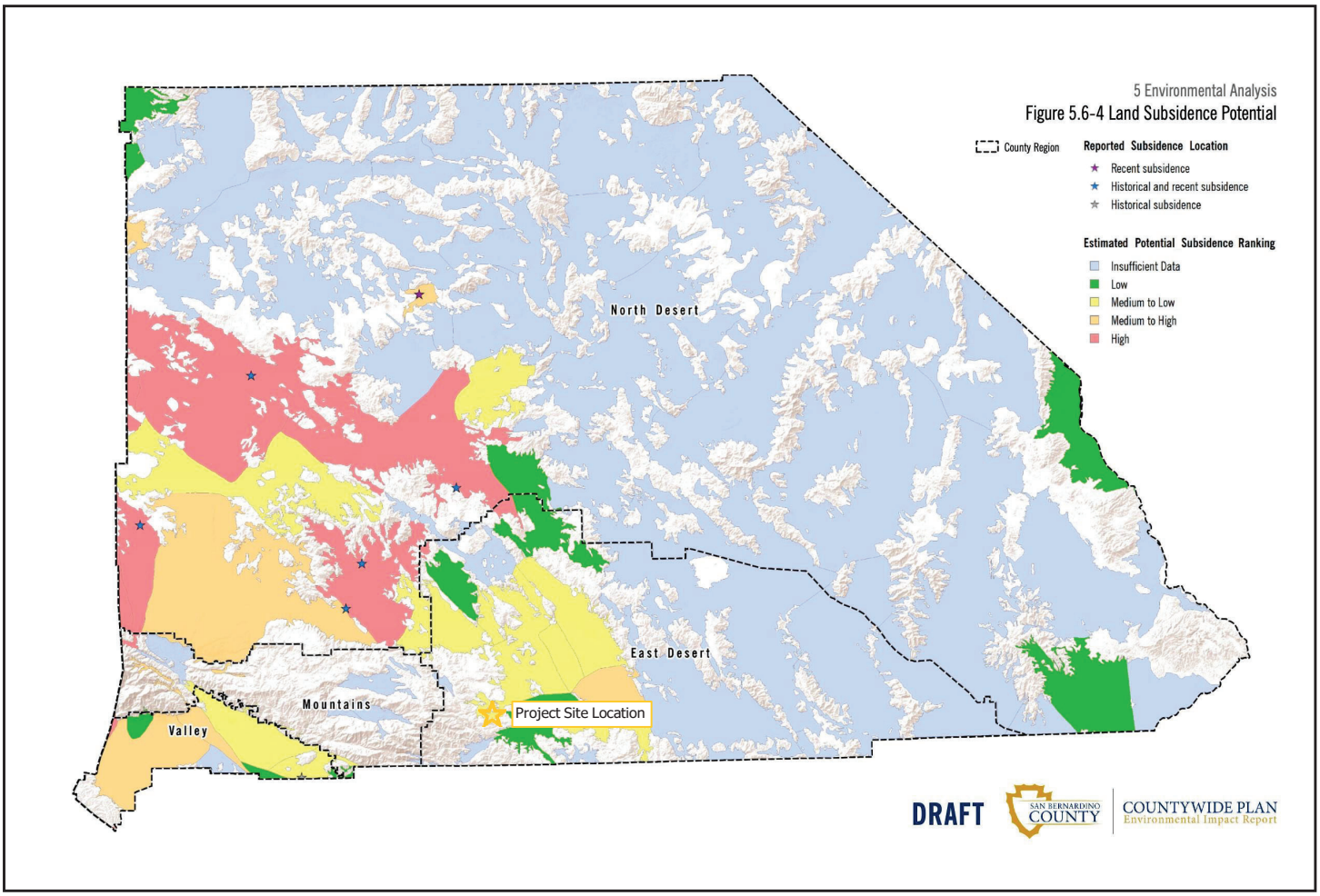


FIGURE VII-3

Tom Dodson & Associates
Environmental Consultants

Subsidence Map

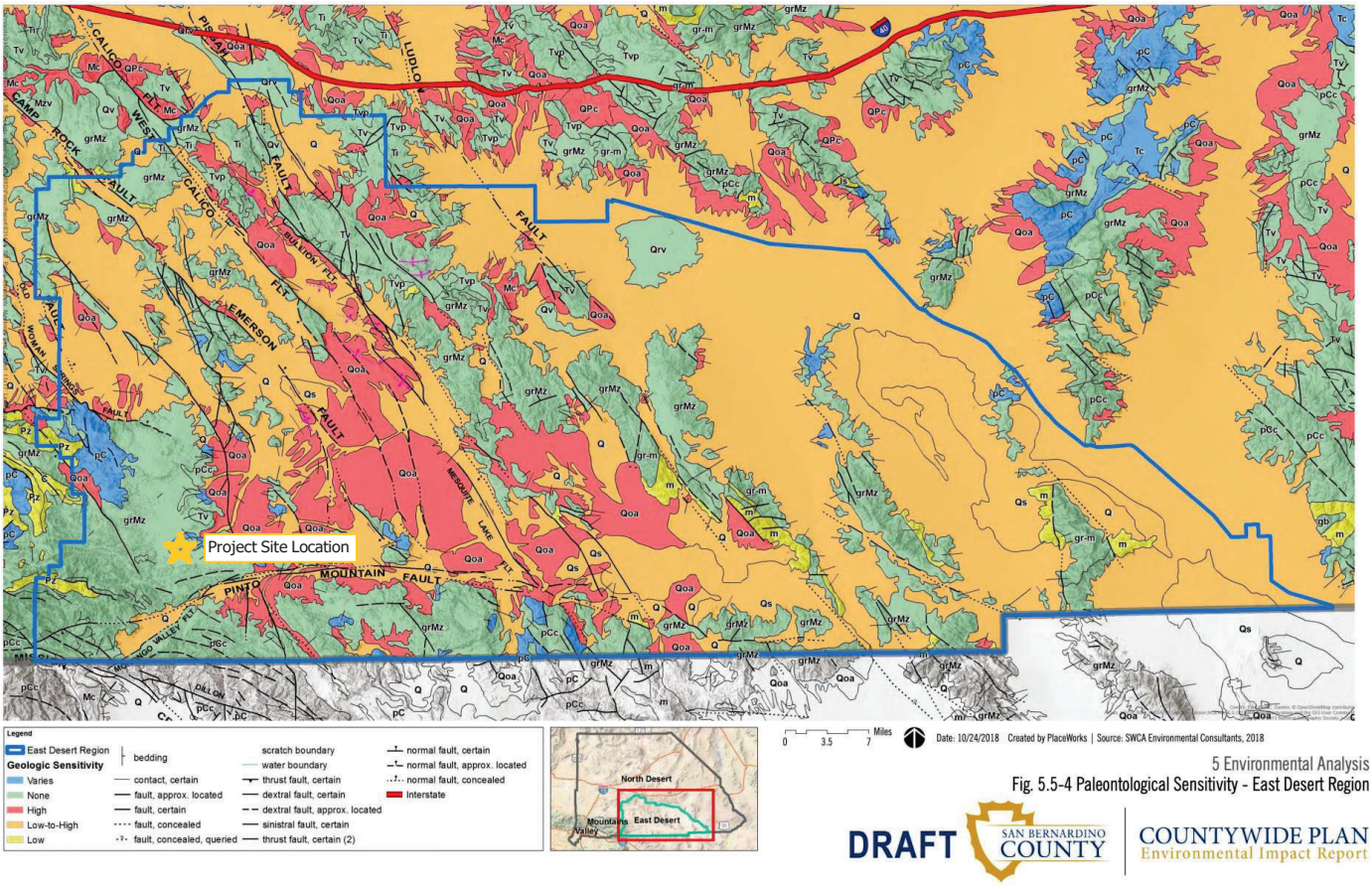


FIGURE VII-4

Tom Dodson & Associates
Environmental Consultants

Paleontological Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

VIII. GREENHOUSE GAS EMISSIONS

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Pioneertown Mane Street Preservation and Improvement Plan Project Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated December 2, 2025. This AQGGA is provided as **Appendix 1** to this Initial Study.

Climate Change Setting

Global climate change (GCC) is the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed project evaluated in this memo cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, this memo will evaluate the potential for the proposed project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and there are no accepted emissions factors or methodology to accurately calculate these gases.

Standards of Significance

According to the *CEQA Guidelines* Appendix G thresholds, to determine whether impacts from GHG emissions are significant. Would the project:

- Threshold 1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Threshold 2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the *CEQA Guidelines* Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- Consideration #1: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- Consideration #2: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- Consideration #3: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts,

the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

Establishment of Significance Thresholds

According to the MDAQMD's CEQA and Federal Conformity Guidelines, a project is significant if it triggers or exceeds the most appropriate evaluation criteria. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO_2e per year (90,718.5 $MTCO_2e/yr$[9]) is sufficient. A significant project must incorporate mitigation sufficiently to reduce its impact to a level that is not significant. A project that cannot be mitigated to a level that is not significant must incorporate all feasible mitigation.

Additionally, the County adopted the GHG Reduction Plan Update in June 2021. The GHG Reduction Plan Update provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. The County includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions. First, a screening threshold of 3,000 $MTCO_2e/yr$ is used to determine if additional analysis is required. Projects that exceed the 3,000 $MTCO_2e/yr$ will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

Impact Analysis

a. *Less Than Significant Impact –*

Existing

As previously stated, the project site is currently developed with 6,223 square foot event and hospitality space (Soundstage) and 831 square foot commercial structure (Gazette). The existing commercial structure (Gazette) is proposed to be redeveloped as an ice cream/coffee shop. The estimated GHG emissions from the commercial structure (Gazette) are summarized in Table VIII-1.

Table VIII-1: Operational Emissions From Existing Development

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Mobile	43.60	< 0.005	< 0.005	0.07	44.20
Area	0.01	< 0.005	< 0.005	<0.01	0.01
Energy	3.49	< 0.005	< 0.005	<0.01	3.50
Water	0.18	< 0.005	< 0.005	<0.01	0.34
Waste	0.07	0.01	<0.01	<0.01	0.24

[9] The threshold was converted from tons to metric tons (MT) to ensure a consistent, apples-to-apples comparison with the project's GHG emissions which CalEEMod reports in MT. This conversion ensures that the GHG emissions from the project can be directly compared to the threshold, allowing for a more accurate and consistent evaluation.

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Refrigeration	<0.01	<0.01	<0.01	<0.01	< 0.005
Total CO_2e (All Sources)	48.29				

Proposed Project

The estimated GHG emissions for project are summarized in Table VIII-2. The estimated GHG emissions include emissions from Carbon Dioxide (CO_2), Methane (CH_4), Nitrous Oxide (N_2O), and Refrigerants (R). As shown in Table VIII-2, the project would generate either a net total of approximately 1,575.07 $MTCO_2e$/yr, which would not exceed the screening threshold of 90,718.5 $MTCO_2e$/yr or the County's screening threshold of 3,000 $MTCO_2e$/yr. This would be considered a less than significant impact.

Table VIII-2: Total Project GHG Emissions

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Annual construction emissions amortized over 30 years	22.17	3.33E-04	1.67E-03	0.01	22.63
Mobile	1,431.00	0.05	0.06	2.30	1,454.00
Area	0.18	< 0.005	< 0.005	<0.01	0.18
Energy	93.00	0.01	< 0.005	<0.01	94.00
Water	4.20	1.00	< 0.005	<0.01	31.00
Waste	6.10	0.61	<0.01	<0.01	21.00
Refrigeration	<0.01	<0.01	<0.01	0.55	0.55
Total CO_2e (All Sources)	1,623.36				
Existing	*48.29*				
Net New Emissions (Project - Existing)	1,575.07				
Screening Threshold (CO_2e)	3,000				
Threshold Exceeded?	NO				

b. *Less Than Significant Impact* – Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions.

Consistency with the 2022 Scoping Plan

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 % below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Consistency With SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The 2016-2040 RTP/SCS indicates that the project site is located in a jobs poor area. Providing more jobs may reduce regional GHG emissions and reduce regional VMT as it will provide local jobs to achieve a more favorable jobs-housing balance.

The project will employ approximately 10 full time employees and 10 part time employees and will operate Monday – Sunday from 8:00 AM – 12:00 AM. According to SCAG's 2024-2050 RTP/SCS, employment within San Bernardino County in 2019 is approximately 860,000 jobs with an anticipated increase to approximately 1,145,000 jobs by 2045, a growth of approximately 285,000 jobs. The proposed project represents 0.004% of the anticipated increase in jobs, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or the AQMP, or result in employment growth that would substantially add to traffic congestion.

Consistency with County of San Bernardino Greenhouse Gas Emissions Reduction Plan and GHG Development Review Process

The County adopted the Reduction Plan in September 2011 (updated June 2021), which provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County.

The County includes a GHG DRP that specifies a two-step approach in quantifying GHG emissions. First, a screening threshold of 3,000 $MTCO_2e$/yr is used to determine if additional analysis is required. projects that exceed the 3,000 $MTCO_2e$/yr will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

As previously shown in Table VIII-2, the project will result in approximately 1,575.07 $MTCO_2e$/yr; the proposed project would not exceed the screening threshold of 3,000 $MTCO_2e$/yr. This would be considered a less than significant impact.

Since the County's Reduction Plan was developed in response to SBCTA's Regional Greenhouse Gas Reduction Plan, and because the project is consistent with the County's Reduction Plan, it is also consistent with the goals outlined in SBCTA's Regional Greenhouse Gas Reduction Plan.

Conclusion

In summary, the results of the assessment indicate that the project would result in a less than significant with respect to GHGs.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

IX. HAZARDS AND HAZARDOUS MATERIALS

SUBSTANTIATION

Impact Analysis

a&b. *Less Than Significant Impact* – The project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; but it may 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 during construction. The proposed project consists of rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking. During construction, there is a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people and the environment. The septic tank must be abandoned (abated) by either removing the tank entirely or backfilling it with an approved material in accordance with the County Development Code Section 33.0879. This activity is not considered to be hazardous in nature when conducted in accordance with County regulations. Due to the size of ground disturbance anticipated as part of development of the proposed project (i.e., less than one acre), the proposed project would not be subject to a Storm Water Pollution Prevention Plan (SWPPP). Thus, in order to reduce accidental release of hazardous materials to a less than significant level, the following condition will be required by the County to be implemented as a BMP during construction of the project.

Condition HAZ-1 **All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency (CUPA) and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released pursuant to a Spill, Prevention, Control, and Countermeasure Plan (SPCCP) to be developed by the Applicant in conformance with County requirements, and reviewed by the County prior to operation. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into construction contract as a BMP to be implemented during construction of the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.**

Operation of the proposed use would not involve the use of a substantial amount of hazardous materials. Household/commercial cleaning supplies would continue to be used in support of the project. These site improvements are not expected to result in any substantial increase in the use of hazardous materials to support these new facilities. Compliance with all federal, State, and local regulations[10] governing the storage and use of hazardous materials is required and would ensure that the project operates in a manner that poses no substantial hazards to the public or the environment. Operational impacts would be less than significant, while construction impacts require adherence to **Condition HAZ-1**.

c. *No Impact* – The project site is not located within one-quarter mile of any public or private schools. The closest school to the project site is the Yucca Valley Elementary School approximately 3-miles

[10] Regulations include, but are not limited to: Federal Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Act (California Health and Safety Code, Section 25100 et seq.), California Accidental Release Prevention Program (CalARP), California Hazardous Materials Release Response Plans and Inventory Law of 1985, California Health and Safety Code, Section 25500 et seq., San Bernardino County Certified Unified Program Agency (CUPA)(SB 1082), etc.

to the southeast of the project site. The proposed project is not anticipated to emit hazardous emissions as discussed under issue IX(a&b), above, as the project consists of rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking, which has little or no potential to use or store substantial amounts of hazardous materials. No hazardous materials would be transported offsite during standard operation. As part of septic abatement and as part of ongoing septic maintenance for the new septic tank, septic waste would be hauled off-site utilizing Pioneertown Road, and eventually Highway 62. This material is not technically categorized as hazardous by septic waste (domestic sewage) and is generally not considered a Resource Conservation and Recovery Act (RCRA) hazardous waste because it is excluded from the definition of solid waste by the Environmental Protection Agency (EPA). Yucca Elementary School is less than a quarter of a mile from Highway 62. However, these roadways are public roads that can be used by any common carrier to or from the local area. For such transporters, the existing regulatory mandates ensure that the hazardous materials and any hazardous waste transported to and from the project site will be properly managed. These regulations are codified in CCR Titles 8, 22, and
26. For example, maintenance trucks for construction equipment must transport their hazardous materials in appropriate containers, such as tanks or other storage devices. In addition, the haulers must comply with all existing applicable federal, state and local laws and regulations regarding transport, use, disposal, handling and storage of hazardous wastes and material, including storage, collection and disposal. Compliance with these laws and regulations related to transportation will minimize potential exposure of humans or the environment to significant hazards from transport of such materials and wastes. Based on this information, implementation of the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impacts are anticipated and no mitigation is required.

d. *No Impact* – The proposed project is not located on a site that is included on a list of hazardous materials sites that are currently under remediation. The two comprehensive State database websites that keep track potential hazmat sites are the California State Water Board's (SWRCB's) GeoTracker website and the Department of Toxic Substance Control (DTSC) EnviroStor website. Both of these databases are consistent with Government Code Section 65962.5 requirements. There are no hazardous materials sites listed in either database within 2,500 feet of the project site (refer to **Figure IX-1**). Therefore, there is no potential for the project to create a significant hazard to the public or the environment due to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impacts are anticipated under this issue and no mitigation is required.

e. *No Impact* – The project site is located greater than 5 miles from any nearby airport. As shown on the Airport Safety & Planning Areas map prepared for the San Bernardino Countywide Plan (**Figure IX-2**), the proposed project is not located within an Airport Safety Review Area at any of the area airports (Yucca Valley Airport and Roy Williams Airport). Further, the proposed project is not located within the AR4-Low Altitude/High Speed Military Airspace Overlay. There is no potential safety hazard for people residing or working in the project area as a result of proximity to a public airport or private airstrip. No mitigation is required.

f. *Less Than Significant Impact* – The proposed project is not anticipated to interfere with an adopted emergency response plan or emergency evacuation plan. As shown on the Evacuation Route Map prepared for the San Bernardino Countywide Plan (**Figure IX-3**), the adopted evacuation routes in the area are Highway 62 to the southeast of the project site, and Highway 247 to the east of the project site. A de facto evacuation route in the vicinity of the project site would be Pioneertown Road, which traverses through the community. Access to the site will occur through the installation of two new driveways along Pioneertown Road, each will only serve as exit or entry only, along Pioneertown Road. The driveway entrance will utilize gravel to provide a compacted gravel access road and driveway in accordance with the fire department standards. Development of the project at this location would not interfere with access to emergency evacuation routes, as the proposed project will be constructed entirely within the boundaries of the project site. Site access is reviewed by the County, and as a result will be designed in accordance with County Development Code, California Fire Code, and San Bernardino County Fire standards. Encroachment onto Pioneertown Road resulting in construction- or operation-related road or lane closures is not anticipated per the site plan (**Figure 3**), and as a result, no conflicts with emergency access or evacuation plans are anticipated to occur. Thus, the proposed project will not experience substantial conflicts with surrounding traffic. Therefore, there is a less than significant potential for the development of the project to physically interfere with any adopted emergency response plans, or evacuation plans.

g. *No Impact* – The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The site itself primarily supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette, and several retail establishments with associated infrastructure and unpaved parking areas and also supports narrow swaths of undeveloped land that are periodically cleared of vegetation in association with routine weed abatement activities and infrastructure maintenance. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Viewer Map (**Figure IX-4**), the proposed project is located in an area with Moderate wildfire risk within a State Responsibility Area (SRA). The proposed project does not include the use of any flammable or explosive materials. The proposed project has no other identifiable potential to expose people or property to wildland fires. Ultimately, the proposed project is located in an area removed from high fire hazard areas within the County (refer to **Figure IX-4**). Therefore, project implementation would not result and a potential to expose people or structures to fire hazards. No mitigation measures are required.

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

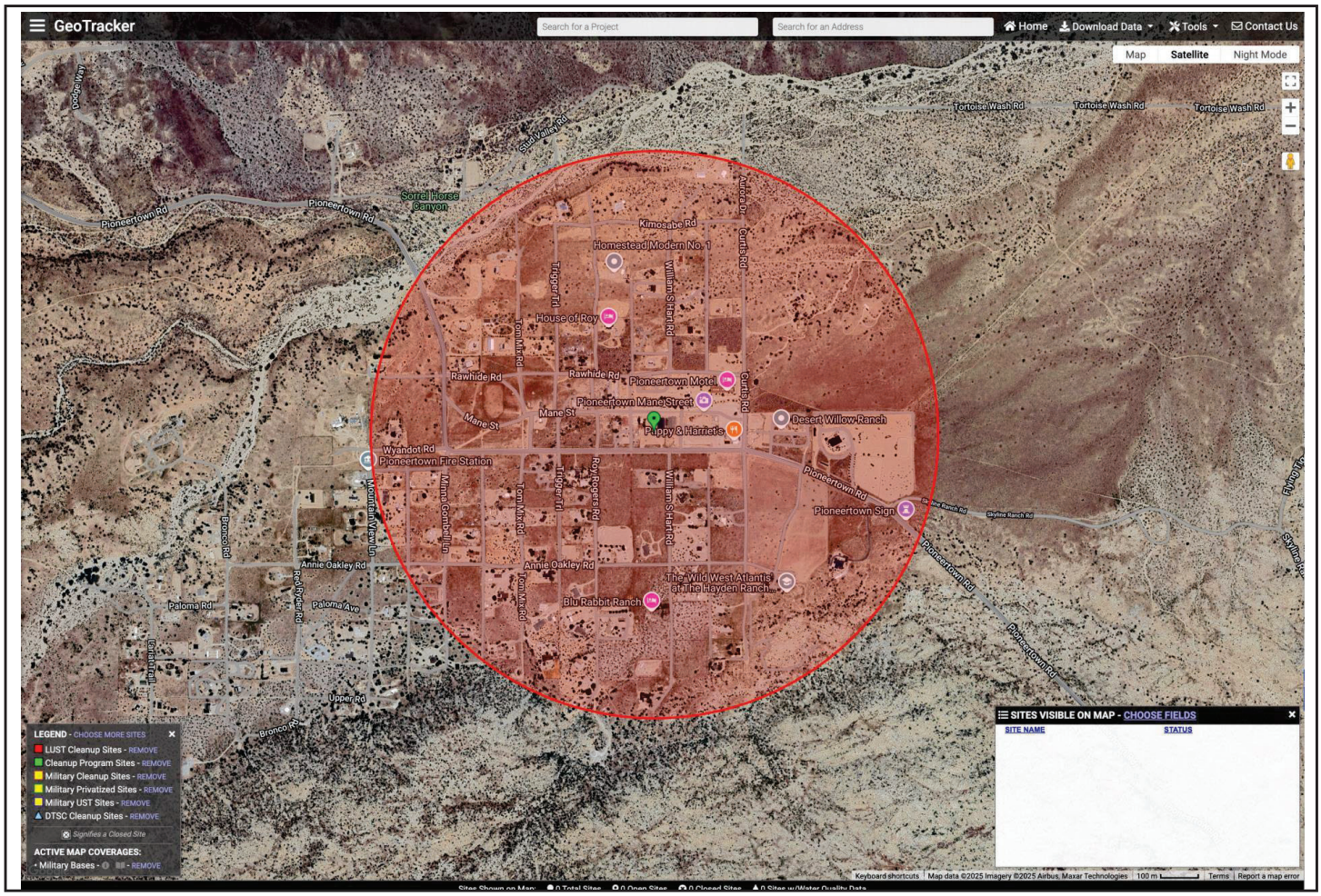


FIGURE IX-1

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GeoTracker Map

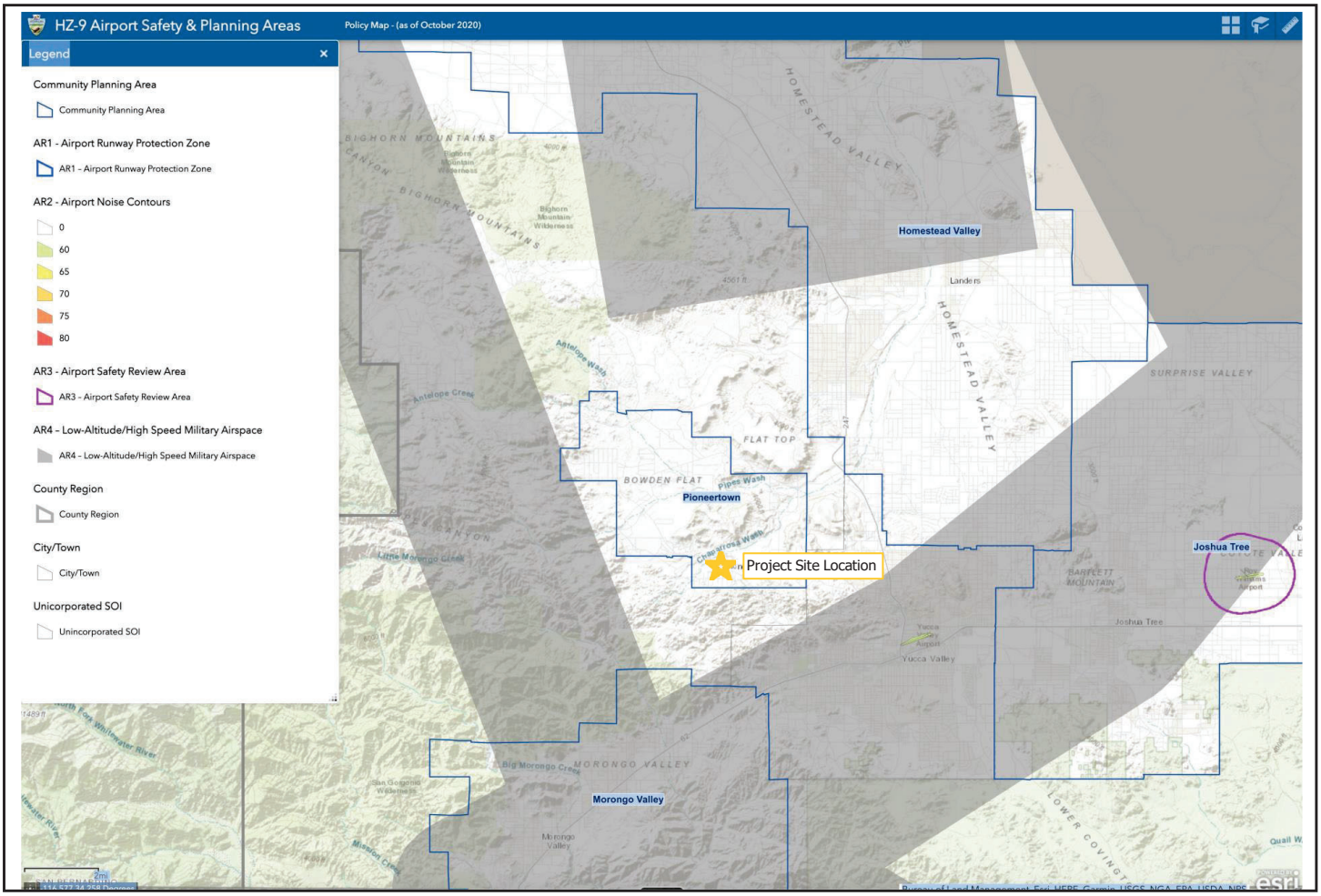


FIGURE IX-2

Tom Dodson & Associates
Environmental Consultants

Airports Map

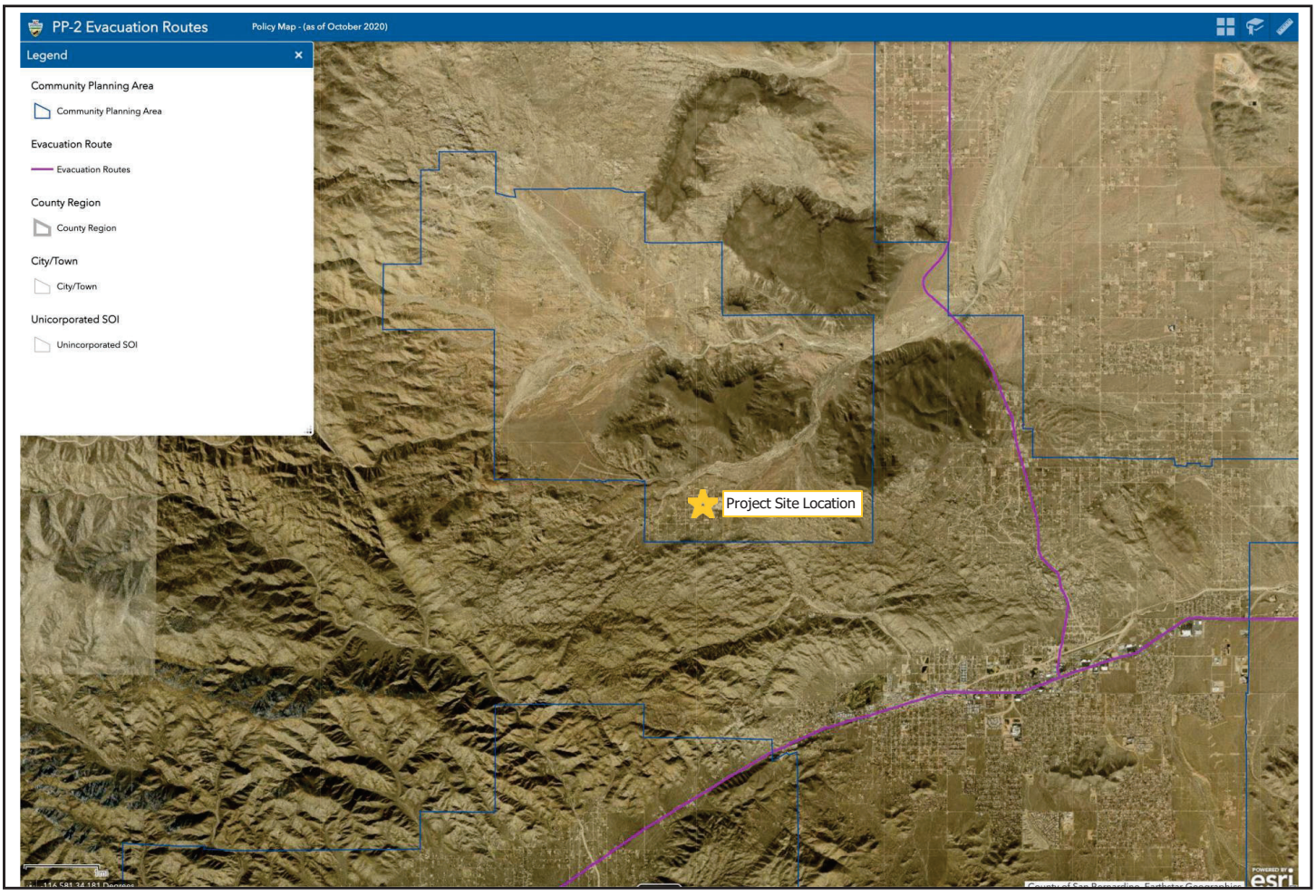


FIGURE IX-3

Tom Dodson & Associates
Environmental Consultants

Evacuation Route Map

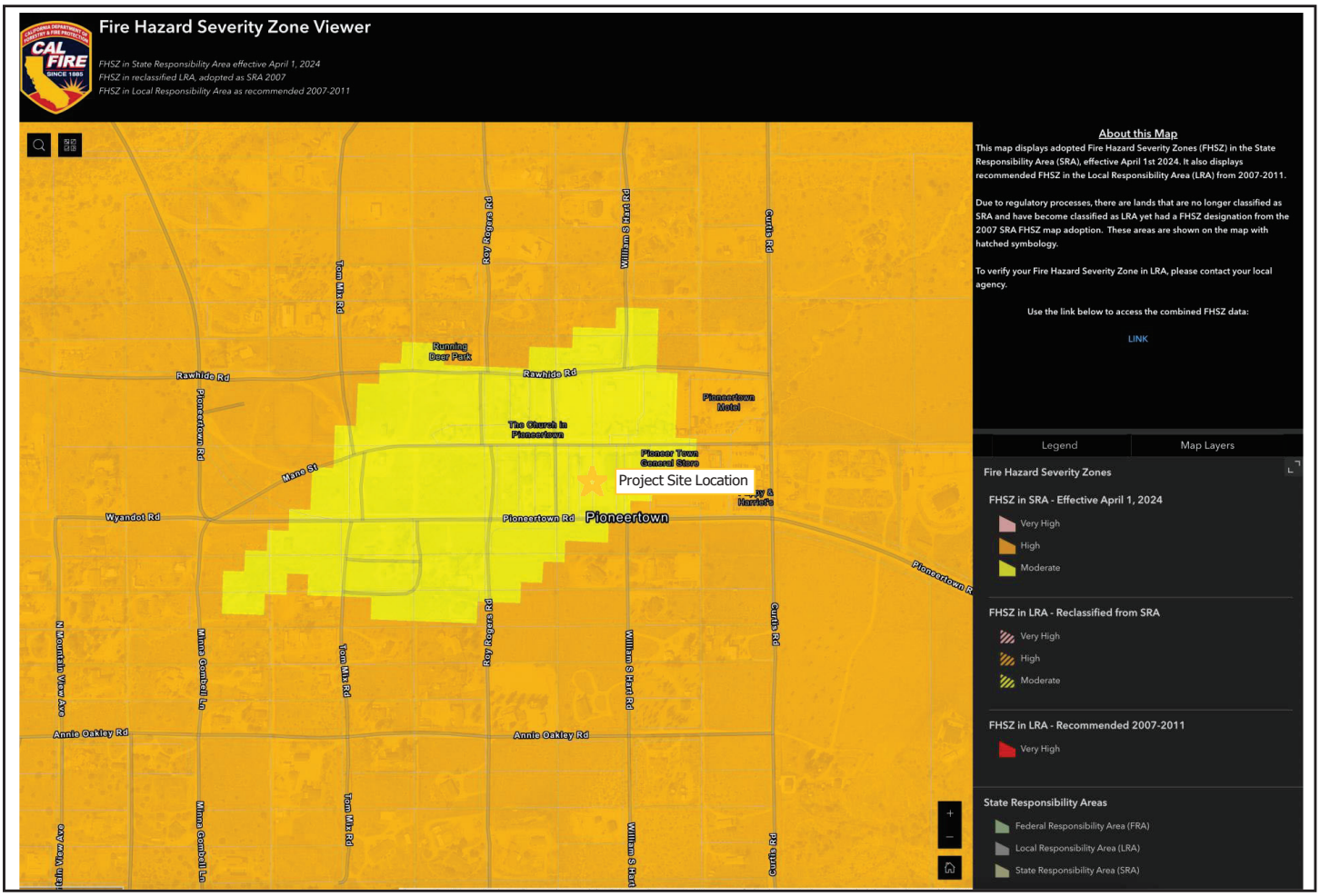


FIGURE IX-4

Tom Dodson & Associates
Environmental Consultants

Fire Hazard Severity Zone Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 onsite or offsite?	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or,	☐	☒	☐	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

X. HYDROLOGY AND WATER QUALITY

SUBSTANTIATION: A *Preliminary Hydrology Studies Pioneertown, San Bernardino, California* has been prepared by Transtech for the proposed project. This study is provided as Appendix 4 to this Initial Study.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed project is located within the planning area of the Colorado River Basin Regional Water Quality Control Board (RWQCB). The

project would be supplied with water by San Bernardino County Department of Public Works Special Districts Water and Sanitation Division, and the project would dispose of wastewater through the use of a new onsite septic system that would replace the existing system with an environmentally upgraded system. This system would be both more efficient than the existing system at processing septic waste, and further, would be developed to prevent septic leeching into the underlying soils or groundwater table.

Three main sources of potential violation of water quality standards or waste discharge requirements are as follows: from generation of municipal wastewater; from stormwater runoff; and potential discharges of pollutants, such as accidental spills. Municipal wastewater would not be generated by the proposed project; however, the proposed project would abate any existing and install a new septic system to accommodate wastewater from the proposed Pioneertown Soundstage Project. The new septic tank system will be capable of handling about 2,000 gallons of waste per day and will be developed in accordance with current California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards, which sets parameters for private sewage disposal, and in compliance with the County Development Code, Article 6. Further, the septic tank must be abandoned (abated) by either removing the tank entirely or backfilling it with an approved material in accordance with the County Code of Ordinances Section 33.0879. Development in accordance with these standards would ensure that water quality regulations are not violated.

The proposed project may result in minor soil erosion during construction activities because the proposed project would be developed within some compacted dirt areas but would not require substantial ground disturbance to facilitate the installation of the project. Due to the small size of the ground disturbance associated with the proposed project (less than one acre), a SWPPP, which would typically address means by which to control potential sources of water pollution that could violate any standards or discharge requirements during construction, is not required. The Applicant shall instead implement BMPs during construction, such as the use of silt fences or coir rolls; the washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads; the storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles) which will be enforced through implementation of **MM HYD-1**. Implementation of **MM HYD-1** in addition to County identified BMPs, would ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term.

Implementation of **MM HYD-1**, in addition to County identified BMPs, would ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term. The BMPs will establish requirements for capturing, retaining, and treating onsite stormwater once the project has been developed. Per Regulatory Requirement (RR) HYD-3 identified in the Countywide Plan, the BMPs provide the following: control contaminant discharges downstream of the project site; and provide education materials to future customers about the public about stormwater impacts.

Further, the Preliminary Hydrology Report (**Appendix 4)** prepared for the proposed project concluded that the proposed improvements within the project site would not increase the existing peak discharges, and therefore the project would not necessitate any attenuation of flows or require discharge point improvements. As a result, operation of the proposed project, once developed, is not anticipated to result in a violation of any water quality standards or waste discharge. Onsite drainage will be managed during operation pursuant to San Bernardino County requirements, which stipulate that individual projects would be required to effectively retain or treat the 85th percentile 24-hour stormwater runoff for pollutants prior to discharge off their properties (Countywide Plan EIR; Page 5.9-29). Therefore, with only minimal changes anticipated as a result of operational impacts, implementation of these mandatory plans and their BMPs, compliance with regulatory requirements identified by the Countywide Plan and County Code of Ordinances Sections 33.0616 and 35.0118, as well as **MM HYD-1** and **Condition HAZ-1** above, will prevent a violation of any water quality standards or waste discharge.

b. *Less Than Significant Impact* – The project does not propose the installation of any water wells that would directly extract groundwater and the change in pervious surfaces to impervious surfaces will be minimal, such that the change in pervious surfaces would be countered by onsite landscaping and vegetation. The project is located within Pioneertown, and the underlying groundwater basin is the Ames Valley Basin. The Ames Valley Basin is an important source of groundwater for producers within the Mojave Water Agency (MWA) service area. The Ames Valley Basin covers an area of approximately 110,000 acres and is bounded by the San Bernardino Mountains on the west, Iron Ridge to the north, Hidalgo Mountain on the northeast, and various faultlines on the east and northern boundaries. The Ames Valley Basin is also subject to stringent groundwater extraction and recharge rules under the Ames/Reche Groundwater Storage and Recovery Program Management Agreement. Based on the type of development proposed, no substantial alterations to existing permeable surfaces would occur, and thus any groundwater recharge that presently occurs onsite would not be obstructed by implementation of the proposed project.

The project would be supplied with water by San Bernardino County Department of Public Works Special Districts Water and Sanitation Division (District) as it is located within County Service Area 70 W4.[11] The District obtains its water from the Mojave and Morongo groundwater basins. As of July 27, 2019, the water system now consists of one well and an emergency inter-tie to the Hi-Desert Water District's system and four water reservoirs with a combined capacity of 345,000 gallons (1.059-acre feet [AF]). There are approximately seven miles of water line and 123 metered water connections utilizing the radio read system. At present, the proposed project represents one of the District's water connections, as the project would constitute the expansion of an existing use.[12] The proposed project would require continued use of water to support site uses. The current water use is about 0.12-acre feet per year (AFY), while the projected water use is not expected to change substantially, with only a potential 10% increase in water use projected for a total of 0.132 AFY. Existing water use and conservation measures are anticipated to cover the demand for water by the proposed site use. As the District has identified sufficient capacity for its existing uses and also

[11] San Bernardino County, 2025. County Service Area 70 W4 Pioneertown. https://specialdistricts.sbcounty.gov/water-sanitation/service-districts/csa-70w4/ (Accessed 05/23/25)
[12] San Bernardino County, 2024. County Service Area 70 W-4 2023 Consumer Confidence Report General District Information https://specialdistricts.sbcounty.gov/wp-content/uploads/sites/54/2024/06/CSA-70-W-4-Pioneertown_2024_Final.pdf (Accessed 05/23/25)

receives Hi-Desert Water District excess supplies from an emergency inter-tie,[13] the San Bernardino County Special Districts 70-W4 municipal water system has been determined to have available capacity to serve the proposed project. Thus, the proposed project is not anticipated to cause a significant demand for new groundwater supplies relative to existing water supply service system capacities. The potential impact under this proposed project is considered less than significant; no mitigation measures are required.

c. i. Result in substantial erosion or siltation on-site or offsite?

Less Than Significant Impact – The project site conditions are similar to those in the surrounding area (i.e., developed with rural desert commercial uses that make up Pioneertown, with sparse desert vegetation characteristic of the Mojave Desert Region). Construction of the proposed project could alter the existing drainage patterns of the site. Given that the project would retain the existing onsite structures and would not include substantial ground disturbing activities beyond excavation for the proposed septic abatement and installation, and trenching for utilities internal to the project site, substantial erosion or siltation on- or off-site is not anticipated to occur. The construction of proposed facilities would require activities such as pavement breaking, ditching, drilling, excavation and demolition, which would temporarily alter each site's existing ground surface and drainage patterns. Compliance with the Construction General Permit (CGP) and SWPPP would be required. Each of these permits and plans would require the implementation of BMPs that manage overland runoff from the project site and establish permanent drainage pathways to stabilized outlets. With implementation of such BMPs and compliance with conditions of required permits governing storm water runoff from construction sites, potential onsite and offsite erosion would be reduced and discharges from construction sites would not exceed the capacity of existing storm water drainage systems. Impacts would be less than significant.

The Preliminary Hydrology Study (refer to **Appendix 4**) demonstrates that the proposed project would not significantly alter the volume of flows downstream of the project site. The project site would continue to drain from southwest to northeast and no increases to peak discharge flows would occur (refer to **Figure X-1** which depicts the proposed hydrological conditions). The Preliminary Hydrology Study further demonstrates that onsite flows would be discharged in conformance with County requirements. Accordingly, the proposed improvements would not necessitate attenuation of flows, discharge point improvements, or alterations to the downstream drainage system. Given that future surface runoff from the project site would remain comparable to that which presently occurs onsite, the potential for downstream erosion or sedimentation would be controlled to a less than significant impact level and no mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?

Less Than Significant Impact – The proposed project would only very minimally alter the existing drainage courses or patterns onsite but would maintain the existing offsite downstream drainage system through control of future discharges from the site. As discussed above under Threshold X(a),

[13] Hi-Desert Water District, 2021. Hi-Desert Water District 2020 Urban Waer Management Plan. https://www.hdwd.com/DocumentCenter/View/807/Hi-Desert-WD-2020-UWMP-Final (Accessed 06/19/25)

above, the proposed project could alter the existing drainage patterns within the project site. Given that the project would retain the existing onsite structures and would not include substantial ground disturbing activities beyond excavation for the proposed septic abatement and installation, and trenching for utilities internal to the project site, it is not anticipated that substantial changes in drainage would occur. The construction of proposed project which would temporarily the site's existing ground surface and drainage patterns and could ultimately provide flooding on- or off-site without preventative measures in place. Compliance with the CGP, SWPPP, or San Bernardino County MS4 Permits (WQMP), where applicable, would be required; these plans would ensure that drainage and stormwater will not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. With implementation of such BMPs, compliance with conditions of required permits governing storm water runoff from construction sites, and retention of runoff on site where feasible, the potential for on- or off-site flooding during construction would be reduced to less than significant levels and discharges from construction sites would not exceed the capacity of existing storm water drainage systems. Impacts would be less than significant with mitigation incorporated.

As outlined in Threshold X(a) above, the Preliminary Hydrology Study (refer to **Appendix 4**) demonstrates that the proposed project would not significantly alter the volume of flows downstream of the project site, and would not be anticipated to change the amount of surface water in any water body in an amount that could substantially increase the rate or volume of runoff in a manner that would result in substantial flooding on- or off-site. The proposed project would continue to drain from southwest to northeast, and the Preliminary Hydrology Study further indicates that the proposed improvement within project site does not increase the peak discharges and does not necessitate any attenuation of flows. It is also recommended that there is no need to do any improvements in the discharge points as peak flows remain virtually the same. As a result, operation of the proposed project once developed is not anticipated to result in increases in peak discharges or changes that would result in substantial flooding on- or off-site (refer to **Figure X-1** which depict the proposed hydrological conditions). The Preliminary Hydrology Study demonstrates that onsite flows would be discharged in conformance with County requirements. The downstream drainage system would not need to be altered and given that future surface runoff from the project site would remain comparable to that which presently occurs onsite as a result of existing operations, and as a result, stormwater runoff would not substantially increase the rate or volume of runoff in a manner that would result in substantial flooding on- or off-site. Impacts under this issue are considered less than significant with no mitigation required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant With Mitigation Incorporated – The proposed project would only very minimally alter the site as the Preliminary Hydrology Report (**Appendix 4**) determined that there is no need to do any improvements in the discharge points as peak flows remain virtually the same. The development of the site would be designed to prevent runoff from leaving the project site or otherwise pretreat the runoff before leaving the site to meet San Bernardino County requirements. Varying amounts of urban pollutants, such as motor oil, antifreeze, gasoline, pesticides, detergents, trash, animal wastes, and fertilizers, could be introduced into downstream stormwater within the watershed. However, the proposed project is not anticipated to generate discharges that would

require pollution controls beyond those already incorporated into the project design and/or required by the County as standard conditions of approval (COAs) to meet water quality management requirements from the RWQCB. As such, the project is not anticipated to result in a significant adverse impact to water quality or flows downstream of the project with implementation of mitigation outlined below.

The County has adopted stringent best management practices designed to control discharge of non-point source pollution that could result in a significant adverse impact to surface water quality. As discussed above, under Threshold X(a), above, the proposed project will be required to implement BMPs throughout the duration of construction through the implementation of **MM HYD-1**, which would ensure proper management of stormwater drainage. In addition, the project will be required to adhere to regulatory requirements identified by the Countywide Plan and County Development Code to ensure that stormwater runoff is controlled. The project would ensure that the degree of water quality control is adequate to ensure the project does not contribute significantly to downstream water quality degradation. Thus, the implementation of onsite drainage improvements and applicable requirements would ensure that drainage and stormwater would not create or contribute runoff that would exceed the capacity of existing or planned offsite stormwater drainage systems or provide substantial additional sources of polluted runoff. With the indicated mitigation, the project's impact under this issue would be reduced to less than significant levels.

iv. Impede or redirect flood flows?

Less Than Significant Impact – As shown on the Federal Emergency Management Agency (FEMA) Federal Insurance Rate Map (FIRM) #06071C8115H dated 8-28-2008 (**Figure X-2**), the project site is located within Zone D which represents areas of undetermined flood hazard. Furthermore, according to the San Bernardino Countywide Plan Flood Hazards Map (**Figure X-3**), the proposed project is not located within a flood hazard zone. As summarized in Threshold X(a) above and further described in the Preliminary Hydrology Study (see **Appendix 4**), the proposed project would not significantly alter the volume of flows downstream of the project site because it would not involve major construction that would change onsite drainage patterns or result in new operations that increase off-site discharge volumes. As a result, flood flows would resemble existing conditions during both construction and operation of the site. As such, development of this site is not anticipated to redirect or impede flood flow at the project site. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

d. *Less Than Significant Impact* – As stated under Threshold X(c[iv]), the proposed project is not located in a known flood hazard area, as mapped by the County and by FEMA (**Figures X-2 and X-3**). The project is not located within the limit of an inundation area associated with any nearby dams. The project is located more than 100 miles from the Pacific Ocean, which eliminates the potential for a tsunami to impact the project area. Additionally, a seiche would not occur within the vicinity of the project because no lakes or enclosed bodies of water exist near the site that could be impacted by such an event. It is anticipated that through compliance with the County Development Code and minimal modifications to the existing drainage patterns within the site, inundation hazards within the County would be reduced to a level of less than significant. Therefore, the potential to expose

people or structures to a significant risk of pollutants due to inundation would be minimal. No mitigation is required.

e. *Less Than Significant Impact* – In 2014, Governor Brown signed into law the Sustainable Groundwater Management Act, also known as SGMA. The Act took effect in 2015. It "requires for the first time in state history that groundwater resources be sustainably managed by local agencies through the formation of Groundwater Sustainability Agencies (GSAs) in each basin that are deemed high-priority or medium-priority by the Department of Water Resources. In such basins, GSAs are required to develop and implement Groundwater Sustainability Plans."[14] The SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins and requires GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California. According to the California Department of Water Resources Groundwater Sustainability Agency Formation Notification System,[15] the groundwater basin underlying the project site is very low priority under SGMA and therefore has not been required to prepare a GSP to address groundwater basin management. The proposed project receives water from the District, which also utilizes Hi-Desert Water Agency supply as emergency supply in emergency circumstances. The District obtains water from the Mojave and Morongo Groundwater Basins, and Hi-Desert Water Agency contains water from the Warren Valley Groundwater Basin and Ames Groundwater Basin. The proposed project would not conflict with the management of groundwater by the District or Hi-Desert Water Agency as these entities manage groundwater use and compliance with the regulations thereof as part of normal operations. As such, the project would not conflict with a sustainable groundwater management plan. Water consumption and effects thereof in the Basin indicate that the proposed project's water demand is considered to be minimal. By controlling water quality during construction and operations through implementation of both short- (SWPPP) and long- (WQMP) term best management practices at the site, no potential for conflict or obstruction of the Regional Board's Water Quality Control Plan has been identified.

Mitigation Program

HYD-1 The Applicant shall require that the construction contractor implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the Developer include the following:

- **The use of silt fences or coir rolls;**
- **The use of temporary stormwater desilting or retention basins;**
- **The use of water bars to reduce the velocity of stormwater runoff;**
- **The use of wheel washers on construction equipment leaving the site;**
- **The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;**

[14] Western Municipal Water District, 2025. Sustainable Groundwater Management Act https://www.wmwd.com/461/Sustainable-Groundwater-Management-Act (accessed 05/20/25)
[15] Department of Water Resources, 2025. Groundwater Sustainability Act Map Viewer. https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true (accessed 05/20/25)

- **The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and**
- **Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.**

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measures.

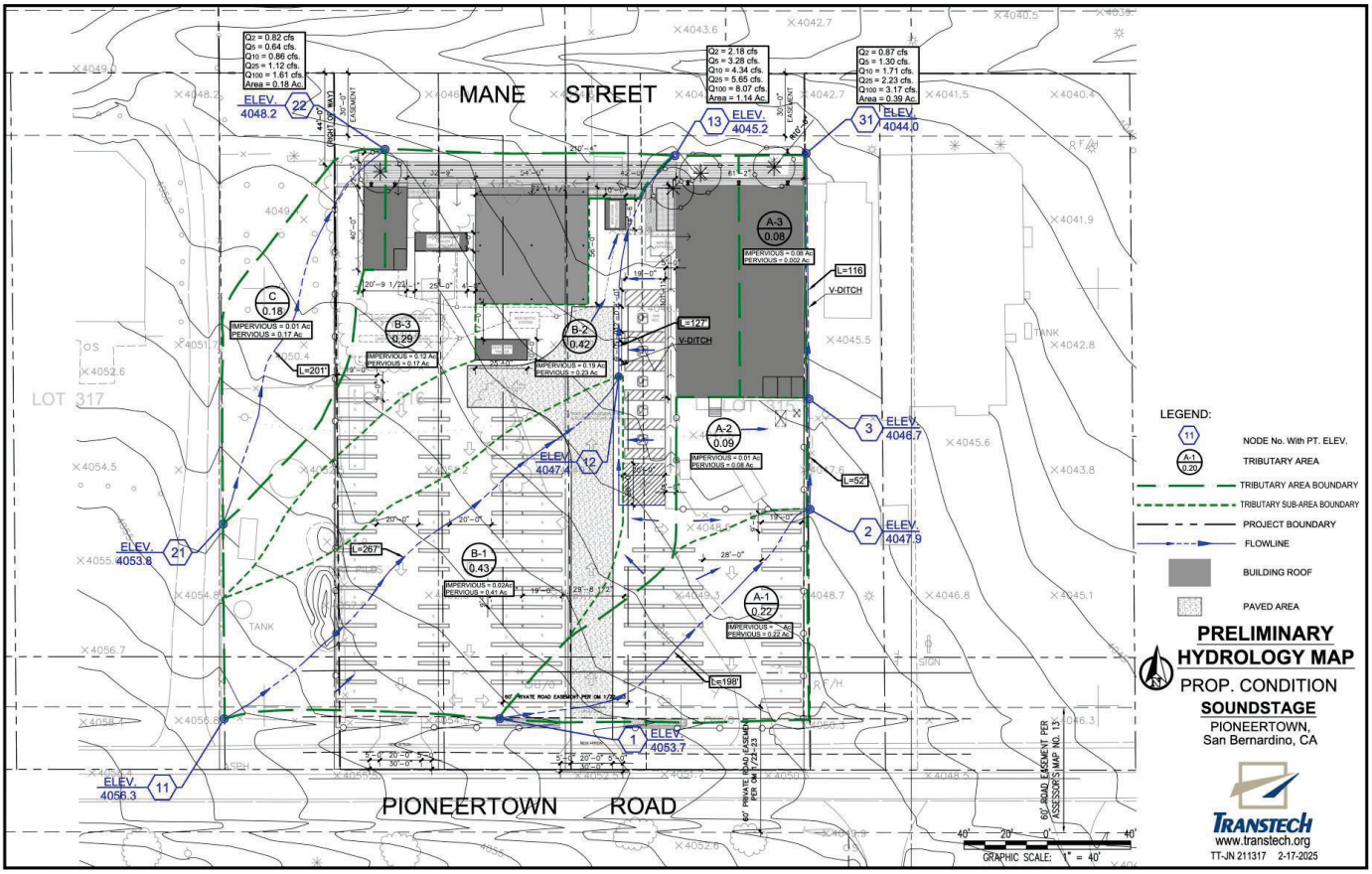


FIGURE X-1

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Preliminary Hydrology Map

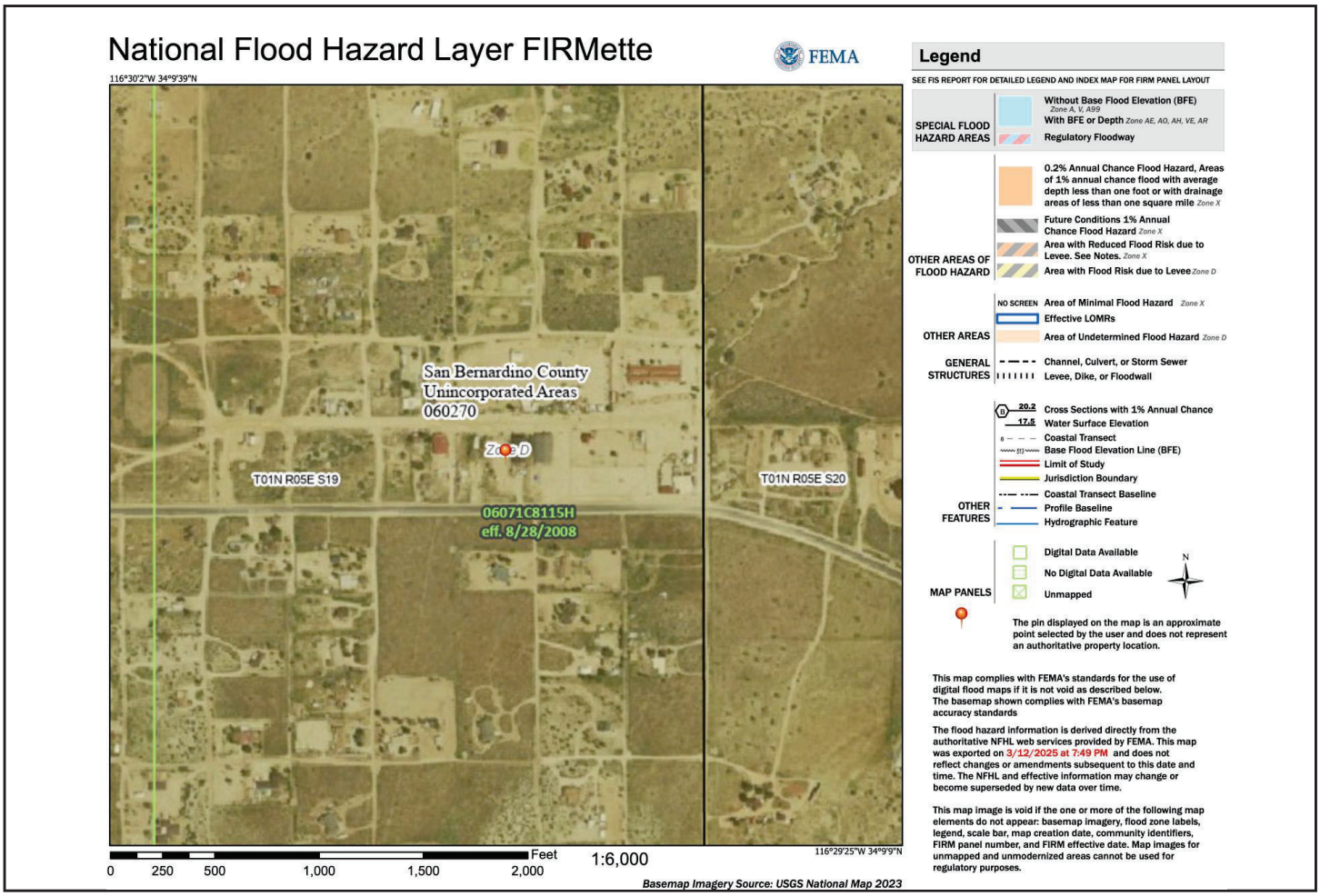


FIGURE X-2

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National Flood Hazard Layer FIRMette

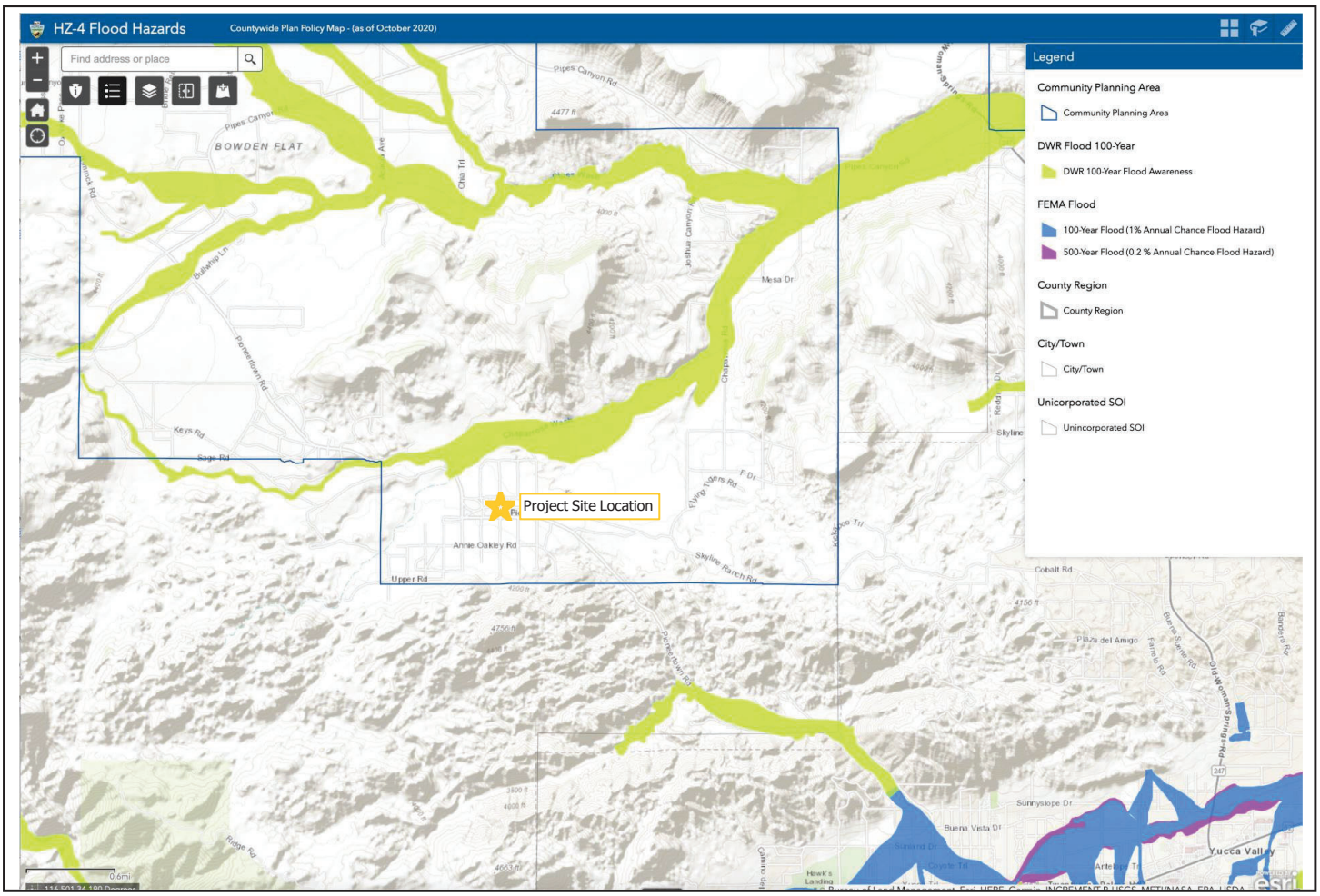


FIGURE X-3

Tom Dodson & Associates
Environmental Consultants

Flood Hazard Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

XI. LAND USE AND PLANNING

SUBSTANTIATION

Impact Analysis

a. *No Impact* – Refer to the aerial photos provided as **Figures 1 and 2**, which depict the project's regional and site-specific location. The San Bernardino County Countywide Plan Land Use designation is Commercial (C), while the Zoning classification is Rural Commercial, while the Zoning District is Special Development-Residential (SD-RES) Land to the north, south, east, and west has the same zoning classification. Note that the project site land use designation is Commercial, as are the surrounding land uses, with the exception of the land use to the south, which is Rural Living. The development of the proposed Pioneertown Soundstage Project on this site would be consistent with the surrounding uses, including the surrounding land use designations and zoning classifications. The proposed project would not include any physical improvements beyond the property line. Rehabilitation of the existing site uses, and enhancement to become the proposed use would reflect a continuance of that which exists at present, and therefore, would not hinder existing residents and visitors from moving through the area on local roadways and trails. Consequently, the development of the project site with the proposed use would not divide any established community. Therefore, no significant impacts under this issue are anticipated and no mitigation is required.

b. *Less Than Significant Impact* – The proposed Pioneertown Soundstage Project consists of the rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking. The site itself primarily supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette and several retail establishments with associated infrastructure and unpaved parking areas and also supports narrow swaths of undeveloped land that are periodically cleared of vegetation in association with routine weed abatement activities and infrastructure maintenance. The project site is located within the Commercial land use designation and is surrounded by rural residential and commercial uses. The Countywide Plan lists the following Goals and Policies under the Land Use Element:

- Goal LU-2 Land Use Mix and Compatibility: An arrangement of land uses that balances the lifestyle of existing residents, the needs of future generations, opportunities for commercial and industrial development, and the value of the natural environment.
  - Applicable policies (as discussed under Threshold I(c) under Aesthetics):
  - **Policy LU-2.1 Compatibility with existing uses.** We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development.
    - The proposed project is at a similar scale as the surrounding uses.
  - **Policy LU-2.4 Land use map consistency.** We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the County Development Code, may be required to maximize compatibility with surrounding land uses and community identity.
    - The proposed project is compatible with the land use map designation, with the approval of a CUP, which the County determined to be necessary due to the nature of the Soundstage and proposed outdoor uses, which would host a variety of uses that, according to the County Development Code Table 82-17 as it pertains to SD-RES uses, require a CUP.
  - **Policy LU-4.7 Dark skies.** We minimize light pollution and glare to preserve views of the night sky, particularly in the Mountain and Desert regions where dark skies are fundamentally connected to community identities and local economies. We also promote the preservation of dark skies to assist the military in testing, training, and operations.
    - The County has adopted the San Bernardino Night Sky Ordinance. All new developments, including the proposed project, may incrementally change conditions of nighttime views and the character of dark skies, but the project would be required to adhere to county standards for lighting and glare to ensure that impacts to night skies would be minimized to a level of less than significant (refer to Threshold I[c]).
  - **Policy LU-4.1 Context-sensitive design in the Mountain/Desert regions.** We require new development to employ site and building design techniques and use building materials that reflect the natural mountain or desert environment and preserve scenic resources.
    - The proposed project would be installed to be compatible with the types of surrounding uses, and furthermore enhance the present use of the site, rather than creating an entirely new site use.
  - **Policy NR-4.1 Preservation of scenic resources.** We consider the location and scale of development to preserve regionally significant scenic vistas and natural features, including prominent hillsides, ridgelines, dominant landforms, and reservoirs.
    - As discussed under this topic (refer to Threshold I[c]), the proposed project would not conflict with the preservation of scenic resources.
  - **Policy NR-4.3 Off-site signage.** We prohibit new off-site signage and encourage the removal of existing off-site signage along or within view of County Scenic Routes and State Scenic Highways.

- The proposed project would not install offsite signage, thus meeting the provisions of this policy. The proposed project would not result in a significant change in viewshed in the vicinity of any County Scenic Route (Pioneertown Road).

The proposed project would be consistent with the above goals and policies as documented in other appropriate sections of this document (e.g., dark skies in Section I, Aesthetics). A review of all other Countywide Plan Goals (Housing Element, Infrastructure & Utilities Element, Transportation & Mobility Element, Natural Resources Element, Renewable Energy & Conservation Element, Cultural Resources Element, Hazards Element, Personal & Property Protection Element, Economic Development Element, and Health & Wellness Element) indicates that the proposed Pioneertown Soundstage Project, is consistent with all applicable Goals, often with mitigation, as demonstrated by the findings in the pertinent sections of this Initial Study. The proposed project can be implemented without significant effects on the circulation system; all infrastructure exists at or can be extended to the site to support the proposed project; it can meet the requirements set forth in the Natural Resources Element pertaining to regional parks and biological resources; it will not generate significant air emissions or GHG emissions and it will meet noise design requirements with mitigation, and as a result it can meet all Safety Element requirements; and it implements the Health and Wellness Element objectives and goals. Therefore, the implementation of this project at this site will be consistent with surrounding land uses, and current use of the site. The proposed project would have a less than significant potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No further mitigation is required.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local Countywide Plan, specific plan or other land use plan?	☐	☐	☐	☒

XII. MINERAL RESOURCES

SUBSTANTIATION: (Check ☐ if project is located within the Mineral Resource Zone Overlay)

Impact Analysis

a. *No Impact* – The proposed project is located within a site containing existing features that will be rehabilitated for the purpose of serving the proposed Pioneertown Soundstage Project. Thus, as the project presently serves a similar use to that which is proposed to be enhanced and expanded by the proposed project, the site does not contain any known important minerals resources. Furthermore, the Countywide Plan Mineral Resource Zones Map indicates that the proposed project is not located within an area containing delineated mineral resources (**Figure XII-1**). Therefore, the development of the site is not anticipated to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts are anticipated and no mitigation is required.

b. *No Impact* –As stated above, the proposed project site does not contain any known mineral resources delineated by the County in its Countywide Plan (**Figure XII-1**) and presently serves a similar use to that which is proposed to be enhanced and expanded by the proposed project. As such, the development of the proposed Pioneertown Soundstage Project at the proposed site would not result in the loss of any available locally important resource recovery site delineated on a local Countywide Plan, specific plan or other land use plan, as no such delineations of this site are known. No impacts under this issue are anticipated and no mitigation is required.

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

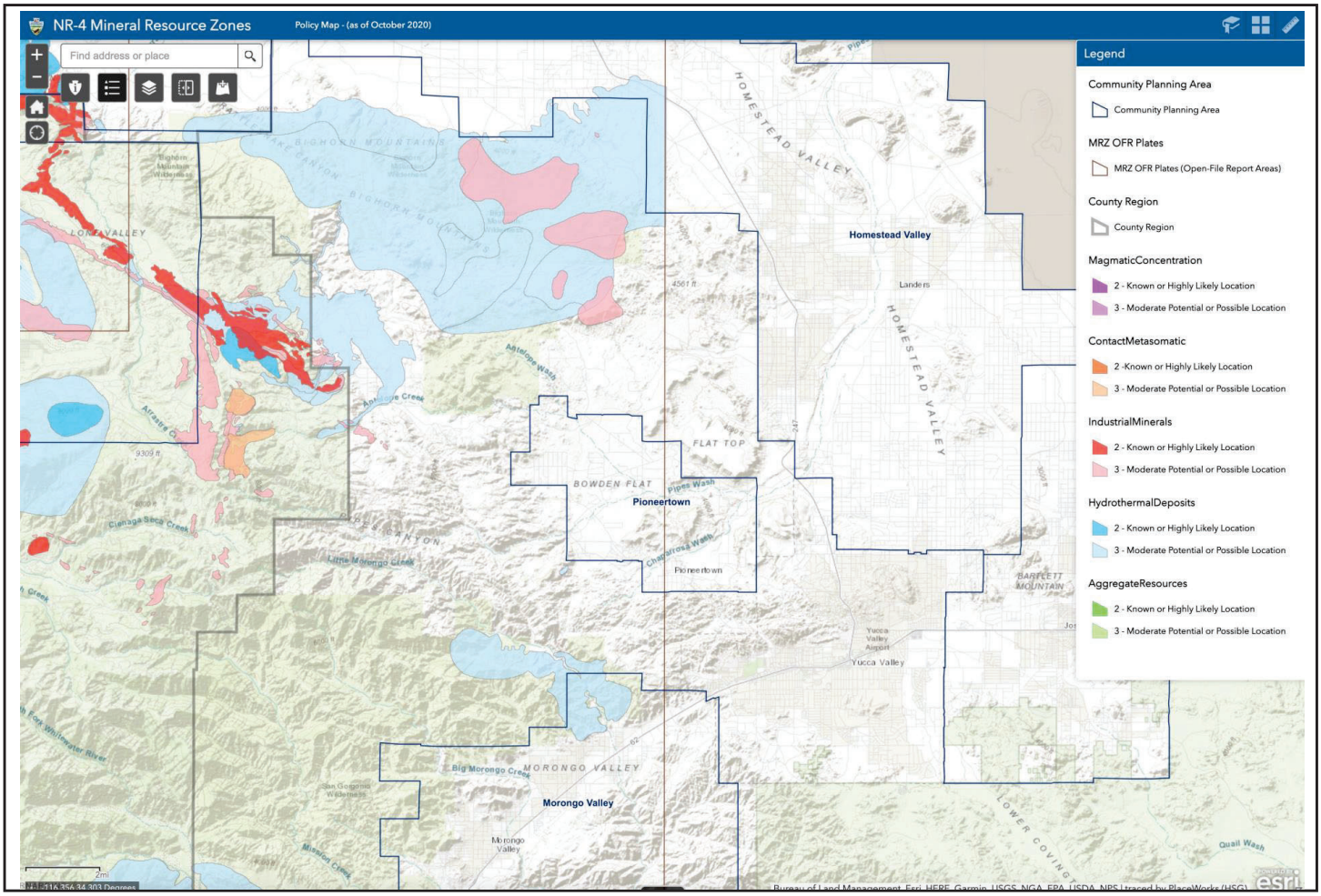


FIGURE XII-1

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Mineral Resource Zones

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

XIII. NOISE

SUBSTANTIATION: (Check if project is located in the Noise Hazard Overlay District ☐ or is subject to severe noise levels according to the Countywide Plan Noise Element ☐) Countywide Plan/Policy Plan 2020; San Bernardino County Development Code. A Noise Impact Study was prepared for the project by MD Acoustics, titled "*Pioneertown Mane Street Preservation and Improvement Plan– Noise Impact Study, Pioneertown – County of San Bernardino, CA*," and dated on December 5, 2025 (**Appendix 5**).

Background

Noise is generally described as unwanted sound. The proposed project consists of rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking. The site itself primarily supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette and several retail establishments with associated infrastructure and unpaved parking areas and also supports narrow swaths of undeveloped land that are periodically cleared of vegetation in association with routine weed abatement activities and infrastructure maintenance. The proposed project is surrounded by residential and commercial development in all directions. The background noise in the project area is low-to-moderate, given the location adjacent to Pioneertown, which experiences relatively high levels of tourism, and noise generated thereof. Background traffic noise along Pioneertown Road is documented on the San Bernardino Countywide Plan Noise Contour provided as **Figure XIII-1**. As such, traffic noise in this area is modest because Pioneertown Road is adjacent to the project site's southern boundary.

The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called "A-weighting," written as "dBA."

L_{eq} is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit of measure is the decibel (dB). The most common averaging period for L_{eq} is hourly.

Because community receptors are more sensitive to unwanted noise intrusion during more sensitive evening and nighttime hours, state law requires that an artificial dBA (A-weighted decibel) increment be added to quiet time noise levels. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multiple family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable" up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

Local Acoustical Requirements

The San Bernardino County Development Code establishes standards concerning acceptable noise levels for both noise-sensitive land uses and for noise-generating land uses. Section 83.01.080 states the following:

> *(c) Noise Standards for Stationary Noise Sources.*
>
> *(1) Noise Standards.* Table XIII-1 (Table 83-2 in the Municipal Code) describes the noise standard for emanations from a stationary noise source, as it affects adjacent properties.

Table XIII-1: Noise Standards for Stationary Noise Sources

Affected Land Uses (Receiving Noise)	Noise Level Limit (L_{eq} dBA)	
	7:00 a.m. - 10:00 p.m.	10:00 p.m. - 7:00 a.m.
Residential	55	45
Professional Services	55	55
Other Commercial	60	60
Industrial	70	70

(2) Noise Limit Categories. No person shall operate or cause to be operated a source of sound at a location or allow the creation of noise on property owned, leased, occupied, or otherwise controlled by the person, which causes the noise level, when measured on another property, either incorporated or unincorporated, to exceed any one of the following:

1. The noise standard for the receiving land use as specified in Subdivision (b) (Noise-Impacted Areas), above, for a cumulative period of more than 30 minutes in any hour.
2. The noise standard plus five dB(A) for a cumulative period of more than 15 minutes in any hour.
3. The noise standard plus ten dB(A) for a cumulative period of more than five minutes in any hour.
4. The noise standard plus 15 dB(A) for a cumulative period of more than one minute in any hour.
5. The noise standard plus 20 dB(A) for any period of time.

The noise level due to the proposed event venue will be compared to the standards provided in Table XIII-1. The noise level at the adjacent property lines must not exceed 55 dBA L_{eq} during daytime hours for residential uses and 60 dBA L_{eq} for commercial uses.

Per Section 83.01.080(g)(3), construction noise is exempt from 7AM to 7PM except Sundays and Federal holidays.

Construction Noise Standards

Neither the Countywide Plan nor Municipal Code established numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. Therefore, a numerical construction threshold based on the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual[16], is used for the analysis of daytime construction impacts, as discussed below. Due to the lack of standardized construction noise thresholds, the Federal Transit Administration (FTA) provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise-sensitive residential land use.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – As stated under background noise above, the proposed project site is located in a low-to-moderate background noise environment. This is because the project site is located along Pioneertown Road, which experiences a modest level of traffic (refer to the noise contours provided as **Figure XIII-1** [existing] and **XIII-2** [future]). Further, the proposed project is located adjacent to Pioneertown, within which noise is generated by tourism drawn to this area.

Existing Noise Conditions

One 1-hour measurement was conducted at the project site on April 10, 2024. The project site is

[16] FTA, 2018. Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration

surrounded by Pioneertown commercial uses to the north, west, and east and vacant residential to the south. The results of the noise measurements are presented in Table XIII-2.

Table XIII-2: Short-Term Noise Measurement Data (dBA)[1]

Location	Start Time	Stop Time	L_{eq}	L_{max}	L_{min}	L(2)	L(8)	L(25)	L(50)	L(90)
NM1	3:05 PM	4:05 PM	48.1	59.9	31.2	57	54	46.3	42.1	36.8
Notes: 1. Short-term noise monitoring locations are illustrated in Appendix B.										

Noise data indicate that the existing ambient noise level is approximately 48 dBA L_{eq}. This includes all the current activity from Pioneertown. **Exhibit XIII-1** shows the approximate measurement location.



Exhibit XIII-1: Measurement Locations

Short Term Construction Noise

Short-term construction noise impacts associated with the proposed project would occur in phases as the project site is developed. Table XIII-3, Typical Construction Noise Levels, shows the estimated noise levels for the various types of construction equipment that would be used on the project site.

Table XIII-3: Typical Construction Noise Levels

Construction Phase	Type of Equipment	Noise Levels (dBA) at 50 feet
Grading	Compactors	82
	Front Loaders	85
	Backhoes	80
	Trucks	88
Material Handling	Concrete Mixer	85
Stationary Equipment	Generators	81
	Compressors	81
Other Equipment	Vibrators	76
	Saws	76

Source: Referenced Noise Levels from the FTA Noise and Vibration Impact Assessment (Table 12-1). https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (accessed 02/11/26)

The earth-moving sources are the noisiest type of equipment, typically ranging up to 88 dB at 50 feet from the source. The nearest sensitive receptor property line is approximately 180 feet south of the project's southern boundary. At 180 feet from the source, the loudest potential construction source (88 dBA) would attenuate to 76.87 dBA at the nearest sensitive receptor property line.[17] Temporary construction noise is exempt from the County Noise Performance Standards between 7:00 a.m. and 7:00 p.m., except Sundays and Federal holidays. Project construction will be limited to daytime hours and specific days in compliance with the County's Development Code. Utilizing the FTA Noise and Vibration Impact Assessment reference noise levels and applying the attenuation factor at a distance of 180 feet, the proposed project would not generate noise in excess of the FTA daytime exterior construction noise level of 80 dBA L_{eq}. Thus, the proposed project would be constructed in compliance with the County's Noise Performance Standards and below the FTA construction noise threshold of 80 dBA L_{eq}, and therefore construction of the project would be less than significant.

In order to further minimize the construction related noise generation to **Mitigation Measures NOI-1 through NOI-5 are** recommended**.** These measures are anticipated to reduce the construction-related noise levels at nearby receptors to the maximum extent feasible and ensure that construction noise falls below the identified 80 DBA Leq construction noise level significance threshold. Through compliance with the above recommended mitigation measure, in addition to regulatory compliance, construction noise impacts of the project on surrounding uses would be reduced to less than significant levels.

Long-Term Operational Noise

The long-term or permanent change in noise consists of the additional trips and noise related to activities associated with full operation of the Pioneertown Soundstage Project. MD Acoustics (**Appendix 5)** evaluated the projected project noise and compared it to the existing condition and County Development Code. The future worst-case noise level projections were modeled using measured sound level data for the stationary on-site sources. The model incorporates the

[17] Omni Calculator, 2026. Distance Attenuation Calculator. https://www.omnicalculator.com/physics/distance-attenuation (Accessed 02/10/26)

topography and buildings and shows how sound propagates to the surrounding area. The model includes SoundPLAN defaults for a night club, dance café with very loud music at 92 dBA Lw on the Soundstage, with the doors of the Soundstage open at all times. The transformer was modeled as a 25-50kVa transformer running constantly at 40 dBA at 8 feet. The outdoor dining area was modeled for daytime only, as the SoundPLAN defaults for a normal beer garden at 66 dBA per square meter, with the outdoor dining area at maximum capacity. Parking was modeled with SoundPLAN defaults, assuming one parking movement per hour for up to 55 spaces. See Appendix C of **Appendix 5** for the modeling inputs and outputs. The future worst-case noise level projections were modeled using measured sound level data for the stationary on-site sources.

The Noise Study (**Appendix 5)** evaluated the projected project noise and compared it to the existing condition and Development Code noise standards. Table XIII-4 below outlines the reference noise levels used to calibrate the models. Potential solutions to reduce the noise impact to adjacent residences were compared using these reference sound levels as a baseline condition and evaluated based on the noise level projections as shown in **Exhibit XIII-2**. Receptor 1 represents the commercially zoned bar to the west. Receptor 2 represents the commercially zoned bowling alley to the east. Receptor 3 represents the unoccupied residentially zoned land to the south. Further south of receptor 3 is an occupied residential property. Receptor 4 represents the commercially zoned motel to the northeast. Receptor 5 represents the commercially zoned church to the northwest.

Table XIII-4: Worst-case Predicted Day/Night Operational L_{eq} Noise Level

Receptor[1]	Day/Night Existing Ambient Noise Level (dBA, L_{eq})[2]	Day/Night Project Noise Level (dBA, L_{eq})[3]	Day/Night Total Combined Noise Level (dBA, L_{eq})	Day/Night Daytime Exterior Noise Limit (dBA, L_{eq})	Day/Night Change in Noise Level as Result of Project
1	48/38	47/43	51/44	60/60	3/6
2	48/38	59/59	59/59	60/60	11/21
3	48/38	46/45	50/45	55/45	2/7
4	48/38	38/36	48/40	60/60	0/2
5	48/38	43/40	49/42	60/60	1/4

Notes:
1. Receptors 1, 2, 4, and 5 represent adjacent commercial properties. Receptor 3 represents an adjacent vacant residential property.
2. See Appendix of Appendix 5 for the ambient noise measurement.
3. See Exhibit XIII-2 for the operational noise level projections at said receptors.

All projected noise levels meet the County code for daytime and nighttime noise limits. The commercial noise level is the loudest just east of the soundstage doors, up to 59 dBA L_{eq} during day and night hours. The residentially zoned properties will be up to 46 dBA L_{eq} during the day and 45 dBA L_{eq} at night.



Exhibit XIII-2: Noise Contours

Thus, operational noise impacts would be less than significant, as nearby sensitive receptors would be protected from excessive noise generation by the proposed project.

Conclusion

With implementation of the mitigation measures proposed to address construction noise and ongoing activities described above, the proposed project would have a less than significant potential to result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local Countywide Plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant with mitigation for both construction and operation of the proposed project.

b. *Less Than Significant With Mitigation Incorporated* – Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second) and discussed in decibel (VdB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The background vibration-velocity level in residential areas (from ongoing activities in a residential area such as cars driving by on a paved road, etc.) is generally 50 VdB[18], while the groundborne vibration directly adjacent to an industrial facility requiring movement of heavy machinery might be greater. Groundborne vibration is normally perceptible to humans at approximately 65 VdB, while 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible. Construction activity can result in varying degrees of groundborne vibration but is generally associated with pile driving and rock blasting. Other construction equipment—such as air compressors, light trucks, hydraulic loaders, etc.—generate little or no ground vibration. Table XIII-5, Typical Vibration Impacts, shows the kind of vibration impact that can occur around typical construction sites.

Table XIII-5: Typical Vibration Impacts

Construction Activity	Distance to Nearest Structure (feet)	Duration	Calculated Vibration Level PPV (in/sec)	Damage Potential Level	Annoyance Criteria Level
Large Bulldozer	25	Continuous/Frequent	0.089	Extremely fragile historic buildings, ruins, ancient monuments	Distinctly Perceptible
Vibratory Roller	25	Continuous/Frequent	0.210	Historic and old buildings	Strongly Perceptible
Loaded Trucks	25	Continuous/Frequent	0.076	No Impact	Distinctly Perceptible

Source; Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018

The County Development Code offers guidance on vibration. County Development Code Section 83.01.090 provides guidance regarding how vibration should be measured and offers the following Standard:

> *Vibration standard. No ground vibration shall be allowed that can be felt without the aid of instruments at or beyond the lot line, nor shall any vibration be allowed which produces a particle velocity greater than or equal to two-tenths (0.2) inches per second measured at or beyond the lot line.*

In the short term, it is possible that groundbreaking construction equipment and other equipment required to construct the whole of the project may have some potential to create some vibration at that traverses the property line, but given that heavy construction equipment is not planned to be used to construct the project, as described in the project description, it is not anticipated that vibration would occur at a strongly perceptible level at any nearby sensitive receptor. According to the County Development Code, construction is exempt from vibration regulations during the hours of 7 AM and 7 PM. As such, vibration related to construction activities would be less than significant because the project would limit construction to these hours, and further construction equipment that would be utilized would not generate substantial vibration.

In terms of groundborne vibration impacts associated with human annoyance, this analysis uses the

[18] FTA, 2018. Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration

FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are an infrequent number of events per day. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 80 VdB at residences and buildings where people normally sleep, and 83 VdB at other institutional buildings.[19] The 65 VdB threshold applies to typical land uses where vibration would interfere with interior operations, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Based on a review of the project footprint, such that the project site presently includes existing historic structures, it is anticipated that the 65 VdB threshold would be applicable to this project. The 80 VdB threshold applies to all residential land uses and any buildings where people sleep, such as hotels and hospitals. The 83 VdB threshold applies to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but still have the potential for activity interference. Depending on how close an actual receptor location is to the project footprint, and the type of building the receptor, it is possible that the vibration levels at a receptor location could exceed the FTA's vibration thresholds for building damage and human annoyance. As such, based on the distance to the nearest sensitive receptors, including historic structure sensitive receptors onsite, vibration impacts during construction associated with the proposed project on existing nearby receptors would require mitigation through implementation of MM NOI-2. Implementation of MM NOI-2 would discourage the use of construction equipment that generates high levels of vibration within specific distances from existing land uses that are located near active construction areas and would ensure vibration field testing and subsequent minimization near occupied residences. This will reduce the construction-related vibration levels experienced by these existing off-site land uses to a level of less than significant.

c. *No Impact* – The project site is located greater than 5 miles from any nearby airport. As shown on the Airport Safety & Planning Areas map prepared for the San Bernardino Countywide Plan (**Figure IX-2**), the proposed project is not located within an Airport Safety Review Area at any of the area airports (Yucca Valley Airport and Roy Williams Airport). Further, the proposed project is not located within the AR4-Low Altitude/High Speed Military Airspace Overlay. As the proposed project is not located within a noise contour for any area airport, it is not anticipated that the proposed project would expose people residing or working in the project area to excessive noise levels. No impacts are anticipated and no mitigation is required.

Mitigation Program

NOI-1 The Applicant shall implement the following measures during construction:

- As necessary, the project applicant shall use supplemental measures to reduce the construction noise levels to comply with requirements specified in the County Development Code. These measures may include, but are not limited to, the erection of noise barriers/curtains, use of advanced or state-of-the-art mufflers on construction equipment, and/or reduction in the amount of equipment that would operate concurrently at the construction site.

[19] FTA, 2006. Transit Noise and Vibration Impact Assessment https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (Accessed 09/19/25)

- Place noise and groundborne vibration-generating construction activities whose specific location on a construction site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise- and vibration-sensitive land uses such as residences, schools, and hospitals.
- Minimize the effects of equipment with the greatest peak noise generation potential via shrouding or shielding to the extent feasible. Examples include the use of drills, pavement breakers, and jackhammers.
- Provide noise shielding and muffling devices on construction equipment per the manufacturer's specifications.
- Identify a liaison for surrounding residents and property owners to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.
- Notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least two weeks prior to groundbreaking.

Construction activities shall occur within the hours considered to be acceptable for construction by the applicable jurisdiction within which an individual project is constructed, except for emergencies.

NOI-2 The County shall require the Applicant's construction contractor(s) to implement the following measures:

- Ensure that the operation of construction equipment that generates high levels of vibration including, but not limited to, large bulldozers, loaded trucks, pile-drivers, vibratory compactors, and drilling rigs, is minimized to below 80 vibration decibels (VdB), within 45 feet of existing residential structures and 35 feet of institutional structures (e.g., schools) during construction. Use of small rubber-tired bulldozers shall be enforced within these areas during grading operations to reduce vibration effects.
- The construction contractor shall provide signs along the roadway identifying a phone number for adjacent property owners to contact with any complaint. During future construction activities with heavy equipment within 100 feet of occupied residences, vibration field tests shall be conducted at the property line near the nearest occupied residences. If vibrations exceed 80 VdB, the construction activities shall be revised to reduce vibration below this threshold. These measures may include but are not limited to the following: use different construction methods, slow down construction activity, or other mitigating measures to reduce vibration at the property from where the complaint was received.

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measures.

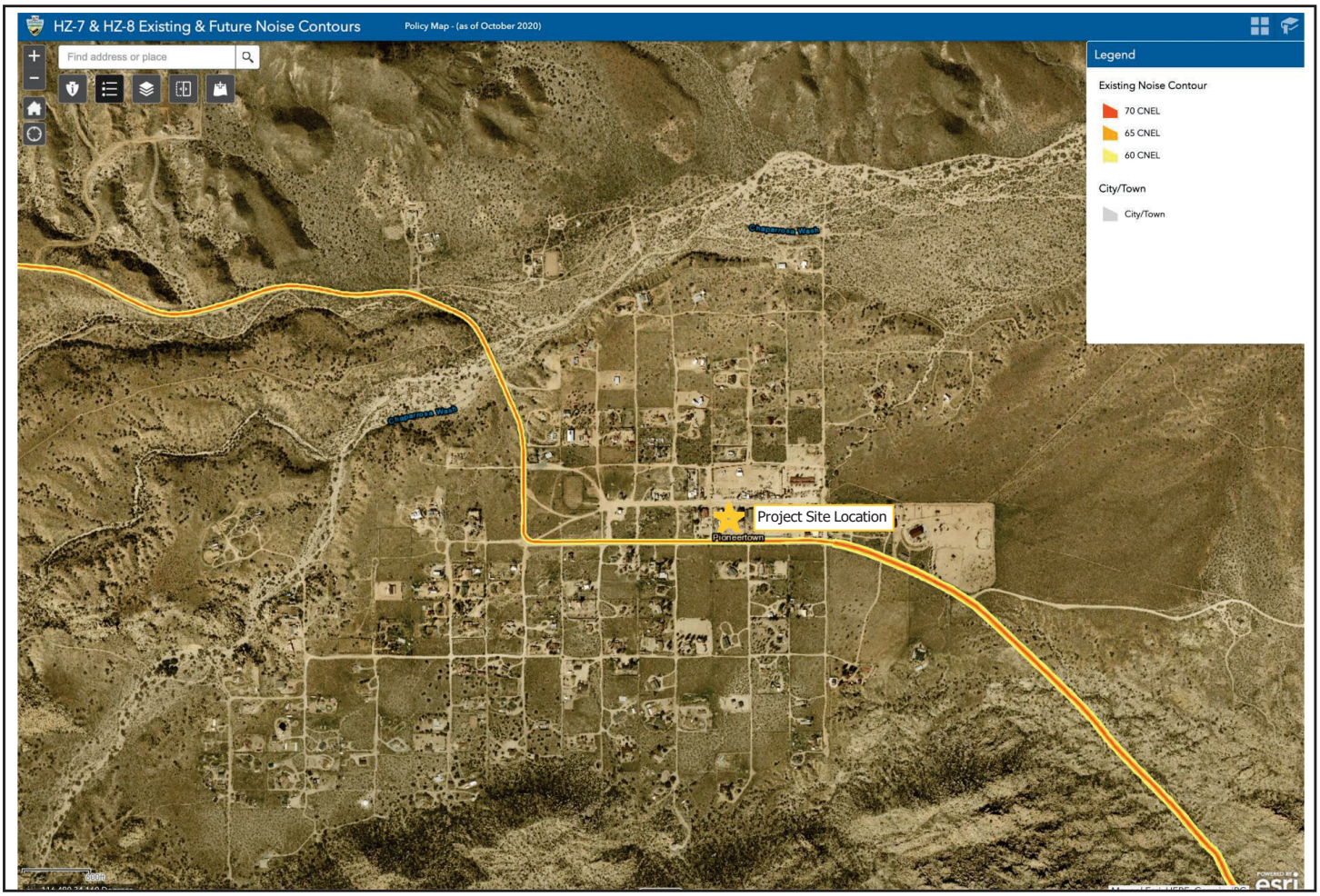


FIGURE XIII-1

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Existing Noise Contours Map

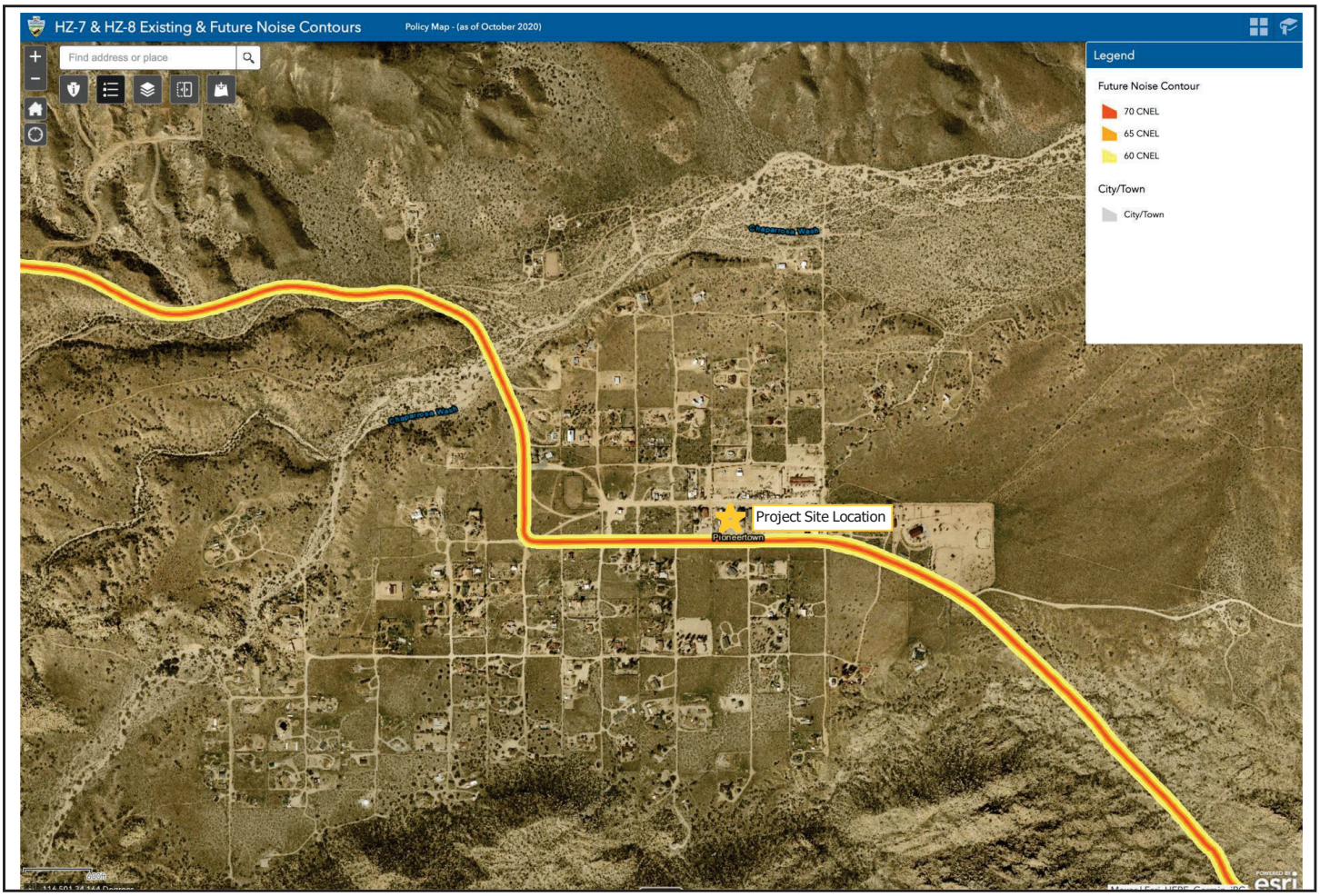


FIGURE XIII-2

Tom Dodson & Associates
Environmental Consultants

Future Noise Contours Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

XIV. POPULATION AND HOUSING

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – Implementation of the project will not induce substantial population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The project site currently supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette and several retail establishments. The proposed project consists of rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking. As such, the proposed project would constitute an expansion of the existing use of the site and would not involve new uses that would have the potential to generate substantial population growth. The proposed project would create a potential for 10 more permanent opportunities for employment during operation, as well as up to 40 part-time employment positions to serve the operations during events or provide seasonal work as applicable, and 15 temporary opportunities for employment in support of project construction. Accordingly, the proposed project would not result in a substantial number of new permanent positions in support of project operations. It is unknown whether the new employees will be drawn from the general area or will bring new residents to the project area, but it is anticipated that many of the employees will reside within San Bernardino County.

According to the Countywide Plan, the total population within unincorporated San Bernardino County was 304,300 persons in 2020, or 13.8% of the overall County population of 2,197,400. The San Bernardino Countywide Plan PEIR indicates that the population of unincorporated San Bernardino County is anticipated to grow to by 39,800 residents (to 344,100) by the year 2040. Accordingly, if all 10 of the new permanent workers required for project operations are new residents to unincorporated San Bernardino County, the project would result in less than a 1%

increase in permanent population. As such, the County has planned for growth in population through 2040, and should the project result in a temporary increase in population by 15 persons during construction, or by up to 50 persons during operations (full- and part-time positions) to support the proposed Pioneertown Soundstage Project, this growth would be well within the planned growth within the County as indicated by the Countywide Plan PEIR. Thus, based on the type of project, and the small increment of potential indirect population growth the project may generate, the population generation associated with project implementation will not induce substantial population growth that exceeds either local or regional projections.

b. *No Impact* – There are no residences or persons residing within the project site, as the project site currently supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette and several retail establishments. Therefore, implementation of the proposed project will not displace substantial numbers of existing housing, or persons necessitating the construction of replacement housing elsewhere. Thus, no impacts will occur and no mitigation is required.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: 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:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

XV. PUBLIC SERVICES

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The proposed project site is served by the San Bernardino County Fire Department, and the nearest Fire Station to the proposed project is Station #41, which is located about 6 miles to the southeast of the project site at 5 92284 Twentynine Palms Outerhighway S, Yucca Valley, CA 92284. Station #41 provides fire protection, fire prevention, and emergency medical services to the Pioneertown and Yucca Valley areas. The proposed Pioneertown Soundstage Project would result in an expanded potential for incidentals related to the uses onsite as a result of the installation of outdoor dining/gathering pavilion, as described in the project description. The project will be served by fire equipment at Station #41, which would be capable of reaching the proposed project in the event of an emergency or fire in less than 7 minutes. It is not forecast that the proposed project would create activities that could increase demand for additional fire protection services beyond that which was forecast in the Countywide Plan for the local jurisdictions within the community of Pioneertown. The Countywide Plan determined that fire protection impacts would be less than significant pursuant to Policy PP 3.2, as planning for these stations is based on data evaluation and professional expertise. Implementing and funding new/expanded stations could occur in different ways, including annexing deficient service areas into districts, creating new districts, and pursuing a tax assessment to be approved by voters (Page 5.14-16). Based on the above information, the proposed project does not pose a significant fire or emergency response hazard, nor is the proposed project forecast to cause a significant demand for fire protection services. The project will be required to adhere to standard conditions by the San Bernardino County

Fire Department to ensure adequate fire flow at the proposed project site. These requirements are considered adequate measures to prevent any significant impacts under this issue, thus no mitigation is required.

b. *Less Than Significant Impact* – The community of Pioneertown receives police services through the San Bernardino County Sheriff's Department. The Department enforces local, State, and federal laws; performs investigations and makes arrests; administers emergency medical treatment; and responds to County emergencies. The Morongo Basin Sheriff's Station is located at 63665 29 Palms Highway Joshua Tree, California 92252, which services the whole of the Morongo Basin, inclusive of much of the Mojave Desert. The Morongo Basin Station is the third largest Sheriff's station in both area and total number of calls for law enforcement services in San Bernardino County. Within the station's area of responsibility are the incorporated communities of Twentynine Palms and the Town of Yucca Valley, as well as the unincorporated communities of Morongo Valley, Landers, Johnson Valley, Joshua Tree, Wonder Valley, Pioneertown, Amboy, Cadiz and Flamingo Heights.[20]

The project site is located within existing Sheriff patrol routes and future calls can be responded to within the identified priority call target response times. The proposed project will incrementally add to the existing demand for police protection services through the expansion of the existing site use. The proposed Pioneertown Soundstage Project is anticipated to create a minimal demand for law enforcement protection services based on the type of uses and the general lack of activities that would substantially increase demand for such services, particularly as the proposed project would merely expand the existing use rather than creating an entirely new use creating an entirely new demand for police protection services. As such, the project is not expected to result in any unique or more extensive crime problems that cannot be handled with the existing level of police resources. No new or expanded police facilities would need to be constructed as a result of the project. Therefore, impacts to police protection resources from implementation of the proposed project are considered less than significant; no mitigation measures are required.

c. *Less Than Significant Impact* – The proposed project is anticipated to temporarily employ a maximum of 15 persons temporarily for the duration of construction and about 10 new permanent employes. As addressed above under issue Population and Housing, XV(a) above, the proposed project does not include any land uses that would substantially induce population growth and will not require a substantial temporary or permanent labor force. The development of Pioneertown Soundstage Project, as proposed, at this site is not anticipated to adversely impact schools. Furthermore, the State of California requires a portion of the cost of construction of public schools to be paid through a fee collected on residential, commercial, and industrial developments. The development impact fee mitigation program of the Morongo Unified School District provides for mitigating the impacts of the proposed project in accordance with current State law (SB 50). Thus, the proposed project will not generate a substantial increase in elementary, middle, or high school population, and since payment of school impact fees is a mandatory requirement, no further mitigation measures are required to reduce school impacts caused by the proposed project to a less than significant level.

[20] San Bernardino County. Morongo Basin Patrol Station. https://wp.sbcounty.gov/sheriff/patrol-stations/morongo-basin/ (Accessed 06/18/25)

d. *Less Than Significant Impact* – The proposed project would not include the development of any park or recreational facilities, and as a result, the proposed project would not directly add to the existing demand on local recreational facilities. The project will develop the Pioneertown Soundstage Project which will result in the creation of about 10 new permanent jobs. The project is not anticipated to generate any substantial direct demand for parks within the County, as this project would have minimal potential to induce population growth within the County. No nearby parks would be impacted by the proposed project, as there are none in close proximity to the project site. The project will contribute to the County's General Fund through payment of property and sales tax, which is considered sufficient to offset any impacts to parks that result from implementing the project. Further, the proposed project would include a new outdoor dining/gathering pavilion that would serve private recreational/park needs. As such, this would offset the minimal potential for increased demand for park and recreation services within the County that may result from implementation of the proposed project and therefore, the proposed project will have a less than significant impact to parks and recreation facilities.

e. *Less Than Significant Impact* – Other public facilities include library and general municipal services. According to the Countywide Plan, County library services are funded mostly through taxes—mainly property taxes and sales taxes. State, federal, and other government assistance, in addition to library fees, also fund the library. Since the project will not directly induce substantial population growth, it is not forecast that the use of such facilities will increase as a result of the proposed project. Thus, any impact under this issue are considered less than significant, and no mitigation is required.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) 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?	☐	☐	☐	☒

XVI. RECREATION

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – As addressed in the discussion under XIV, Population and Housing, above, the proposed project does not include a use that would substantially induce population growth. As stated in the discussion under Population and Housing, the project would create about 10 new positions of employment at the Pioneertown Soundstage Project; however, it is unknown what portion of the employees will be new residents. The proposed project will contribute to the County's General Fund through payment of property and sales tax. Further, the proposed project would include a new outdoor dining/gathering pavilion that would serve private recreational/park needs. Refer to the discussion under Threshold XV(d), above. Given that the proposed project would not induce substantial population growth, that the project is not within land designated for recreational use, in addition to the availability of land for recreational use in the surrounding area, the project is not anticipated to result in a substantial increase in the use of existing park and recreation facilities. Therefore, any impacts under this issue are considered less than significant. No mitigation is required.

b. *No Impact* – The proposed project site is vacant and does not include any existing recreational facilities. The proposed Pioneertown Soundstage Project will not require the development or expansion of recreational facilities. Therefore, the proposed project is not anticipated to cause an adverse physical effect on the environment as a result of construction or expansion of recreational facilities.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous inter-sections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

XVII. TRANSPORTATION

SUBSTANTIATION: San Bernardino County, July 2019. San Bernardino County Transportation Impact Study Guidelines. A Technical Memorandum entitled *"Pioneertown Mane Street Preservation and Improvement Plan Project Transportation Screening Assessment"* that was prepared by Ganddini Group, Inc., and is dated November 6, 2025. This report is provided as **Appendix 6** to this Initial Study.

Impact Analysis

a. *Less Than Significant Impact* – Implementation of the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located at 53585 Mane Street, Pioneertown, CA 92268. The Pioneertown Soundstage is located along Pioneertown Road in the unincorporated community of Pioneertown. The proposed project is presently not served by paved sidewalks along either Mane Street or Pioneertown Road along the northern and southern property boundaries. However, the project proposes to improve accessibility within the site, including ADA accessible entrances to each of the three proposed uses (Pioneertown Soundstage, Pioneertown Gazette, and Outdoor Dining/Gathering Pavilion), and ADA parking adjacent to the Soundstage. Installation of sidewalk at this location is not a County requirement, and this area is not slated for pedestrian circulation improvements as shown on the San Bernardino Countywide Plan Bicycle and Pedestrian Planning Map provided as **Figure XVII-1.** As a result, the proposed project would not conflict with pedestrian circulation. The proposed project is slated to be served by a Class II Bike Lane[21] along Pioneertown Road, and the proposed project includes roadway dedication to the County that could be utilized to support the installation of a Class II Bike Lane in future. As a result, the proposed project would not conflict with bicycle circulation. The project site is not located within a service

[21] Class II bicycle facilities are striped lanes that provide bike travel and can be next to a curb or parking lane. If next to a curb, a minimum width of five feet is recommended. A bike lane adjacent to a parking lane can be four feet in width. Bike lanes are exclusively for the use of bicycles and include bike lane signage, special lane lines, and pavement markings.

route for any area transit providers, and as such will not impact the transit circulation system. The proposed project would continue to be accessible by existing means of transport, with enhanced access to the site through the proposed driveway improvements installed by the project.

The project would generate construction traffic, which is temporary; during construction, the project is anticipated to generate no more than 30 round truck trips per day, and a maximum of 45 employee roundtrips per day (assumes 10-15 employees with potential for more than one roundtrip per day per employee); these trips would be spread throughout the day during construction. The net new trips generated by the change in land use of the Gazette from small office to coffee/ice cream shop and the new dining area are reviewed. The continued existing use of the Soundstage is exempt from the transportation screening assessment as an existing use. Table XVII-1 shows that the proposed project operational trip generation forecast is based on average rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) for Land Use Codes 712 (Small Office), 926 (Food Cart Pod) and 936 (Coffee Donut Shop without Drive Through Window). It should be acknowledged that these trip generation rates are based on general urban/suburban settings, as opposed to the rural setting of the project site because of a lack of ITE trip generation in rural settings. Due to the small-town nature of Pioneertown, the proposed project land uses are primarily anticipated to serve visitors that will already be in the area and capture trips generated by the existing primary on-site uses such as the Soundstage and nearby uses such as Camp Pioneertown and Pioneertown Motel. Therefore, the majority of trips to/from the proposed uses are expected to be internal and/or pedestrian trips, and the vehicle trip estimates are likely overstated especially given the use of the general urban/suburban ITE data which provides a conservative estimate.

Pass-by Trip Adjustments

The project trip generation (**Appendix 6**) includes pass-by trip adjustments based on average pass-by rates obtained from the ITE Trip Generation Manual. Land uses such as shopping centers, restaurants, and coffee shops will often be located next to busy roadways to attract motorists already on the street. When there is no daily pass-by data provided in ITE Trip Generation Manual Appendices, the daily pass-by value is determined by the average of the AM peak and PM peak pass-by rates. Pass-by trips are included at the project driveways and applied after internal capture adjustments.

Net New Trip Adjustment

The project trip generation includes a reduction for the existing trips generated by the existing commercial structure (Gazette), which is proposed to be redeveloped as an ice cream/coffee shop.

Project Trips

As shown in Table XVII-1, the proposed project is forecast to generate a total of approximately 380 daily trips, including 24 trips during the AM peak hour and 15 trips during the PM peak hour. **Figure XVII-2** illustrates the forecast directional distribution patterns of the project generated trips. The project trip distribution patterns are developed from engineering judgement based on review of existing volume data, surrounding land uses, and the local and regional roadway facilities in the project vicinity.

Table XVII-1:Project Trip Generation

Trip Generation Rates									
Land Use	Source[1]	Land Use Variable[2]	AM Peak Hour			PM Peak Hour			Daily Rate
			% In	% Out	Rate	% In	% Out	Rate	
Small Office Building	ITE 712	TSF	83%	17%	1.64	34%	66%	2.16	14.39
Food Cart Pod	ITE 926[3]	FC	50%	50%	6.16	60%	40%	6.16	77.00
Coffee Donut Shop without Drive-Through Window	ITE 936[3]	TSF	51%	49%	91.02	50%	50%	31.53	485.48

Trips Generated									
Land Use	Source	Quantity	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Existing to be removed									
Small Office Building	ITE 712	0.831 TSF	1	0	1	1	1	2	12
Proposed development									
Food Cart Pod	ITE 926	2 FC	*6*	*6*	*12*	*7*	*5*	*12*	*154*
Coffee Donut Shop without Drive-Through Window	ITE 936	0.831 TSF	39	38	76	13	13	26	403
Pass-by Trips (83%AM, 81%PM, 44% Daily)	ITE 937[5]		*-32*	*-31*	*-63*	*-11*	*-11*	*-21*	*-165*
Subtotal			*7*	*6*	*13*	*2*	*3*	*5*	*238*
Subtotal Project Trips (Gross)			45	44	89	19	20	39	543
Total Pass-by Trips			-32	-31	-63	-11	-10	-21	-165
TOTAL NEW TRIPS GENERATED			13	12	25	9	8	17	392
TOTAL NET NEW VEHICLE TRIPS GENERATED			12	12	24	8	7	15	380

Notes:

1. ITE = Institute of Transportation Engineers Trip Generation Manual (12th Edition, 2025); ### = Land Use Code. All rates based on General Urban/Suburban setting.
2. TSF = Thousand Square Feet; FC = Food Carts.
3. ITE rates with data from San Diego Association of Governments (SANDAG) Vehicular Traffic Generation Rates (April 2002). Where the daily or peak hour rate is not provided by ITE, the SANDAG percentage of peak hour to daily rate is used to calculate the missing data. Where the peak hour distribution is not provided by ITE, the SANDAG peak hour distribution is used.
4. Pass-by trips calculated in accordance with procedures in the ITE Trip Generation Manual (12th Edition, 2025). Daily pass-by is calculated using half of the AM and PM pass-by average rates.

The proposed project satisfies the County-established level of service (LOS) screening criteria for projects generating fewer than 50 peak hour trips. Therefore, the project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established LOS screening criteria. Thus, the proposed project would have a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including roadway facilities.

b. *Less Than Significant Impact* – SB 743 mandates that California Environmental Quality Act (CEQA) guidelines be amended to provide an alternative to Level of Service for evaluating transportation

impacts. The amended CEQA guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Traveled (VMT) for transportation impact evaluation.

The San Bernardino County adopted analytical procedures, screening tools and impact thresholds for VMT, which are documented in the San Bernardino County Transportation Impact Study Guidelines (July 2019) (County Guidelines). The County Guidelines provides details on appropriate criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following types:

- Project Type Screening
- Transit Priority Area (TPA) Screening
- Low VMT Area

A land use project needs only to meet one of the above screening thresholds to result in a less than significant impact. The proposed project appears to meet the Project Type Screening for the following reasons: The project consists of redeveloping an existing historically themed retail area with less than 10,000 square feet increase in retail services. The Office of Planning and Research (OPR)(now Office of Land Use and Climate Innovation) Technical Advisory provides a categorical exemption for existing facilities including additions to existing structures of up to 10,000 square feet. The community outdoor dining gathering pavilion provides supplemental services for the existing historically themed services. Based on the size and hours of operation of the supplemental services, they would not be significantly relevant outside the local area, and they provide retail services with less than 50,000 square feet for the local themed retail area. Therefore, this screening criteria is met and VMT impacts would be less than significant.

c. *Less Than Significant Impact* – Access to the site will occur through the installation of two new driveways along Pioneertown Road, each will only serve as exit or entry only, along Pioneertown Road. The driveway entrance will utilize gravel to provide a compacted gravel access road and driveway in accordance with the fire department standards. Development of the project at this location would not substantially increase hazards due to a geometric design feature or incompatible uses, as the proposed project will be constructed entirely within the boundaries of the project site. Site access is reviewed by the County, and as a result will be designed in accordance with County standards. Encroachment onto Pioneertown Road is not anticipated per the site plan (**Figure 3**). Thus, the proposed project will not experience substantial conflicts with surrounding traffic. There are no uses that would be impacted by construction equipment or construction trips on the adjacent roadways. Trucks delivering equipment can enter the site without major conflicts with the flow of traffic on the roadways used to access the site. Additionally, the proposed project would be required to comply with all applicable fire code for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the County, as well as the local police and fire departments. Therefore, the proposed project would have a less than significant potential to substantially increase hazards due to a geometric design feature or incompatible uses. No mitigation is required.

d. *Less Than Significant Impact* – The proposed project is not anticipated to result in inadequate emergency access. As shown on the Evacuation Route Map prepared for the San Bernardino Countywide Plan (**Figure IX-3**), the adopted evacuation routes in the area are Highway 62 to the

southeast of the project site, and Highway 247 to the east of the project site. A de facto evacuation route in the vicinity of the project site would be Pioneertown Road, which traverses through the community. The proposed project is not located along a County identified emergency route, nor would implementation of the project impede emergency response from accessing the site or surrounding area. Access to the site will occur through the installation of two new driveways along Pioneertown Road, each will only serve as exit or entry only, along Pioneertown Road. The driveway entrance will utilize gravel to provide a compacted gravel access road and driveway in accordance with the fire department standards. Site access is reviewed by the County, and as a result will be designed in accordance with County Development Code, California Fire Code, and San Bernardino County Fire standards. Encroachment onto Pioneertown Road resulting in construction- or operation-related road or lane closures is not anticipated per the site plan (**Figure 3**). As a result, impacts to emergency response and/or emergency evacuation plans are considered less than significant. Thus, because of the lack of adverse impact on local circulation no potential for significant impacts on emergency access are forecast to occur during construction or operation. No further mitigation is required.

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

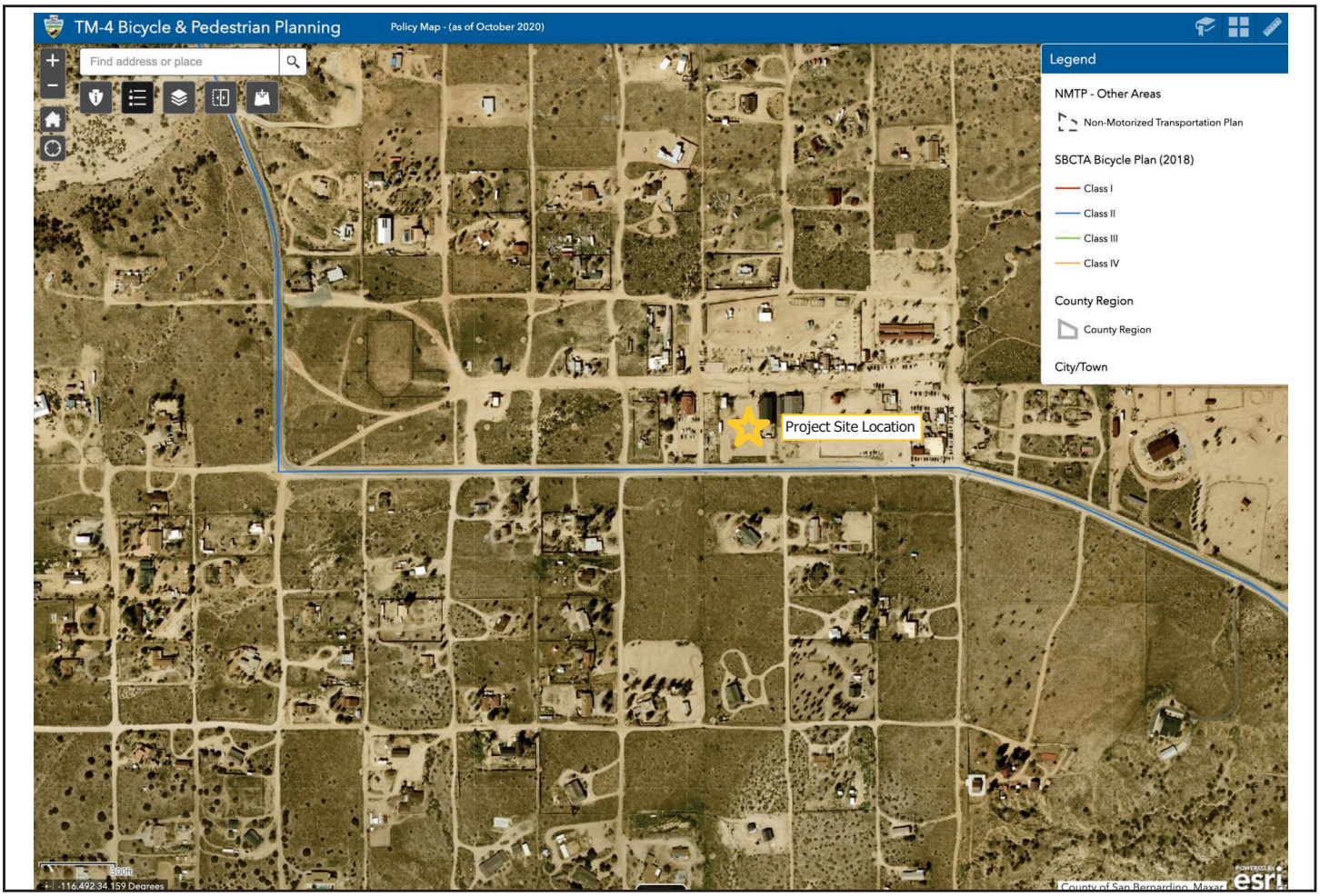


FIGURE XVII-1

Tom Dodson & Associates
Environmental Consultants

Bicycle & Pedestrian Planning Map

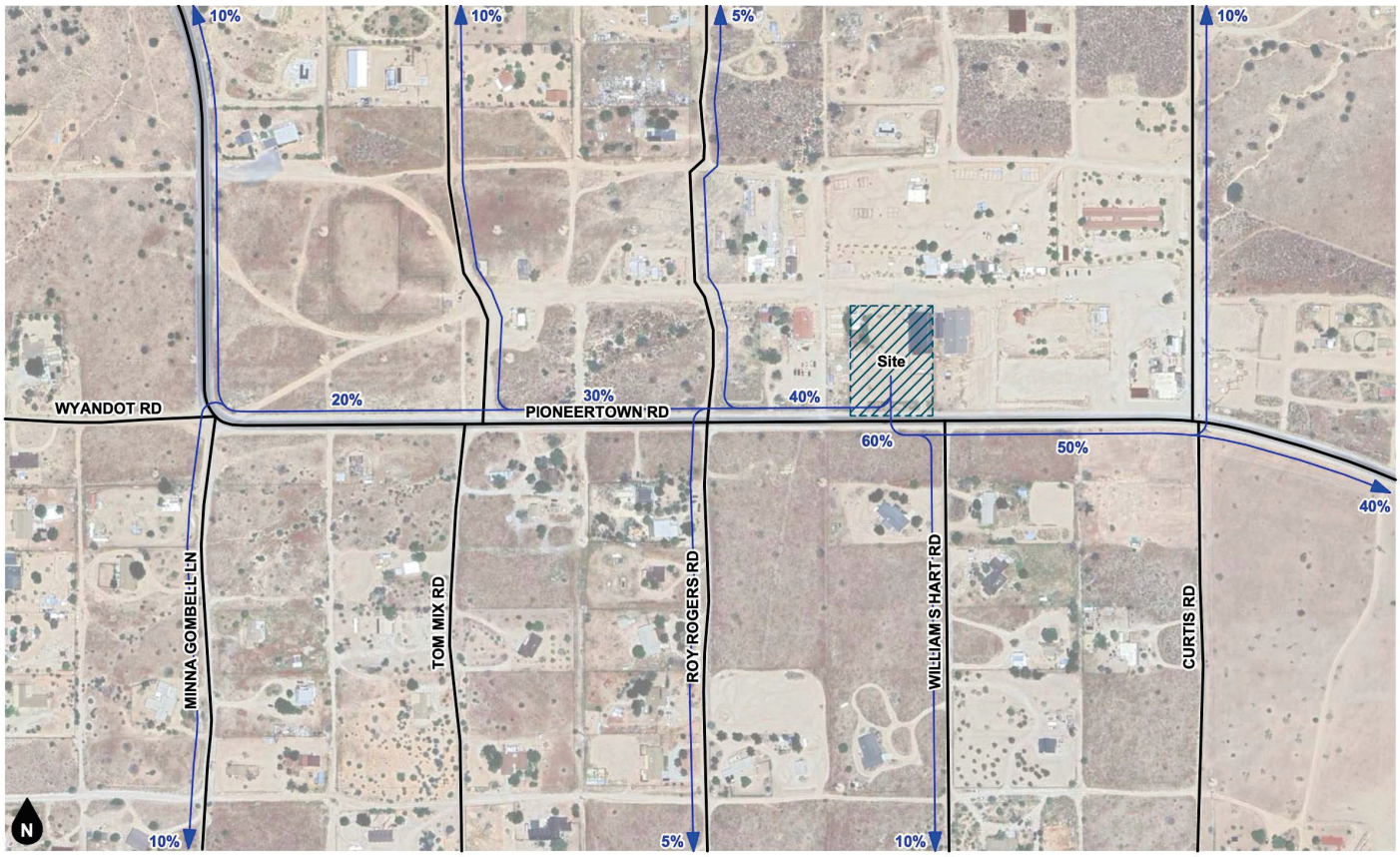


FIGURE XVII-2

Tom Dodson & Associates
Environmental Consultants

Project Trip Distribution

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographic-ally defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
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 sub-division (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.	☐	☒	☐	☐

XVIII. TRIBAL CULTURAL RESOURCES

SUBSTANTIATION: 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. Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Impact Analysis

a&b. *Less Than Significant with Mitigation Incorporated* – The County has been contacted by several Tribes under Assembly Bill (AB) 52 requesting to be consulted on applicable projects within the County. The Tribes with a historical presence in the Pioneertown area were contacted by the County through mailed letters to initiate the AB 52 process on December 6, 2023. These Tribes are: Soboba Band of Mission Indians, Yuhaaviatam of San Manuel Nation, Morongo Band of Mission Indians, Fort Mojave Indian Tribe, and the Twenty-Nine Palms Band of Mission Indians. During the 30-day consultation period, the County received a response from the Twenty-Nine Palms Band of Mission Indians, which indicated that the project is outside of the known Chemehuevi Traditional Use Area. As a result, consultation under AB 52 was not requested. Therefore, consultation has concluded with

no request from any Tribe to be included as a consulting party for this project. Therefore, with no input from any Tribes, the analysis and conclusions under the Cultural Resources Section above shall ensure that no significant impacts to any Tribal Cultural Resources occur. As such, **MM CUL-2**, which require earthmoving or grading activities in the immediate area of any cultural materials to be halted and for an onsite inspection to be performed immediately by a qualified archaeologist, impacts to tribal cultural resources would be less that significant. No further mitigation is required beyond that which was identified under Section V, Cultural Resources, above.

Mitigation Program

CUL-2 Should any cultural resources be encountered during construction of the project, earthmoving or grading activities in the immediate area of the finds shall be halted and an on-site inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the on-site archaeological professional, who is acceptable to the County and retained by the Applicant. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

Therefore, no significant adverse impacts are identified or anticipated with implementation of the above mitigation measures.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

XIX. UTILITIES AND SERVICE SYSTEMS

SUBSTANTIATION

Impact Analysis

a) Water

Less Than Significant Impact – Domestic water is supplied to the Pioneertown area by the San Bernardino County Department of Public Works Special Districts Water and Sanitation Division (District), as Pioneertown is located within County Service Area 70 W4. There is already domestic water service provided to the existing use at the Pioneertown Soundstage Project site. No new water lines are anticipated to be installed, as the connections to the existing uses are sufficient to accommodate the proposed Pioneertown Soundstage Project. Further, water use at the project site is not anticipated to grow beyond a 10% increase under the expanded site use, and as a result, the District would not require new or expanded water service facilities to serve the proposed project. Therefore, development of the Pioneertown Soundstage Project would not result in a significant

environmental effect related to the relocation or construction of new or expanded water facilities. Impacts are less than significant.

Wastewater

Less Than Significant Impact – The project would dispose of wastewater through the use of a new onsite septic system that would replace the existing system with an environmentally upgraded system. This system would be both more efficient than the existing system at processing septic waste, and further, would be developed to prevent septic leeching into the underlying soil or groundwater table. The proposed project would install a new septic system to accommodate wastewater from the proposed Pioneertown Soundstage Project. The new septic tank system will be capable of handling about 2,000 gallons of waste per day and will be developed in accordance with current California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards, which sets parameters for private sewage disposal, and in compliance with the County Development Code, Article 6. At most, the septic systems would require emptying by a qualified septic plumber once every 2 years. These systems would collect the wastewater generated by onsite water uses, including wastewater disposal. Other than installing the internal wastewater collection lines, the proposed project is not anticipated to require relocation or construction of new or expanded wastewater collection (sewer) lines to serve the proposed project, such that a significant impact would occur. No connections to the municipal wastewater collection system or a wastewater treatment plant are required. No municipal wastewater providers exist in the area, so none serve the project site, and as a result, septic must be utilized to process wastewater generated by the proposed project. Therefore, given that the proposed project would not result in significant impacts under any issue, as demonstrated throughout this Initial Study, development of the Pioneertown Soundstage Project would not result in a significant environmental effect related to the relocation or construction of new or expanded wastewater facilities. Impacts are less than significant.

Stormwater

Less Than Significant Impact – As outlined in Threshold X(a) above, the Preliminary Hydrology Study (refer to **Appendix 4**) demonstrates that the proposed project would not significantly alter the volume of flows downstream of the project site. The proposed project would continue to drain from southwest to northeast, and the Preliminary Hydrology Study indicates that the proposed improvement in the area of concern do not increase the peak discharges and does not necessitate any attenuation of flows. It is also recommended that there is no need to do any improvements in the discharge points as peak flows remain virtually the same. Therefore, surface water would be adequately managed on site and as such, development of the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power

Less Than Significant Impact – SCE would provide electricity to the site and the power distribution system would be able to supply sufficient electricity to the site, particularly given that the site is presently served with this service. The proposed project will be supplied with electricity by SCE through the existing electrical connection located within the site. SCE will be able to continue to supply sufficient electricity because the project site would not generate substantial increase in energy demand such that expansion of SCE's existing or development of new energy generation facilities would be necessary. Energy use associated with project occupancy would be typical of a

commercial use, and would not require new or expanded electrical systems to accommodate energy demanded by the proposed Pioneertown Soundstage Project beyond that the project would be required to comply with the most recently adopted California Energy Code, and as part of the utilization and rehabilitation of the historic structures on site, would upgrade the existing electrical panel by installing a new electrical panel to meet the CBC and Fire Code. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded electric power facilities. Impacts are less than significant.

Natural Gas

No Impact – Development of the proposed Pioneertown Soundstage Project would not create a significant new demand for natural gas. The project site would not require any connection to natural gas to support project operations, as electricity would serve the full operations proposed at the project site. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. No impacts are anticipated.

Telecommunications

No Impact – Development of the proposed Pioneertown Soundstage Project would not require installation of new wireless internet service or phone serve. The proposed project would utilize existing connections to wireless internet/phone services currently used at project site. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunication facilities. No impacts are anticipated.

b. *Less Than Significant Impact* – Please refer to the discussion under Threshold X(b). The project would be supplied with water by San Bernardino County Department of Public Works Special Districts Water and Sanitation Division (District) as it is located within County Service Area 70 W4.[22] As of July 27, 2019, the water system now consists of one well and an emergency inter-tie to the Hi-Desert Water District's system and four water reservoirs with a combined storage capacity of 345,000 gallons (1.059 AF). At present, the proposed project represents one of the District's water connections, as the project would constitute the expansion of an existing use.[23] The proposed project would require continued use of water to support site uses. The current water use is about 0.12-acre feet per year (AFY), while the projected water use is not expected to change substantially, with only a potential 10% increase in water use projected for a total of 0.132 AFY. Existing water uses and conservation measures are anticipated to cover the demand for water by the proposed site use. As the District has identified sufficient capacity for its existing uses and furthermore has identified an emergency inter-tie with the Hi-Desert Water District's water system, which has identified in its 2020 UWMP sufficient supply to accommodate demand,[24] the San Bernardino County Special Districts 70-W4 municipal water system has available capacity to serve the proposed project. Thus,

[22] San Bernardino County, 2025. County Service Area 70 W4 Pioneertown. https://specialdistricts.sbcounty.gov/water-sanitation/service-districts/csa-70w4/ (Accessed 05/23/25)
[23] San Bernardino County, 2024. County Service Area 70 W-4 2023 Consumer Confidence Report General District Information https://specialdistricts.sbcounty.gov/wp-content/uploads/sites/54/2024/06/CSA-70-W-4-Pioneertown_2024_Final.pdf (Accessed 05/23/25)
[24] Hi-Desert Water District, 2021. Hi-Desert Water District 2020 Urban Waer Management Plan. https://www.hdwd.com/DocumentCenter/View/807/Hi-Desert-WD-2020-UWMP-Final (Accessed 06/19/25)

the proposed project would have a less than significant impact related to the availability of sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. No mitigation is necessary.

c. *No Impact* – The project would not 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. However, this is due to the fact that no municipal wastewater providers exist in the area, so none serve the project site. The project will be served by a new onsite septic system that would replace the existing system with an environmentally upgraded system. No impacts are anticipated and no mitigation is required.

d. *Less Than Significant Impact* – Other than the small amount of construction wastes and waste associated with the visitors of the Pioneertown Soundstage Project, the project will not generate a substantial amount of solid wastes and will not adversely affect the existing solid waste disposal system. Further, the existing use of the site generates solid waste, and while this may increase with the expanded use of the site, it is not anticipated to increase substantially. At present, trash is handled onsite through the use of an onsite dumpster, and the solid waste provider is Burrtec. Based on the CalRecycle Estimated Waste Generation Rates,[25] the proposed project is estimated to generate solid waste as follows:

6,223 SF Pioneertown Soundstage: (restaurant generation rate applied)	0.005 pounds per day per SF
831 SF Pioneertown Gazette Cowboy Coffee and Creamery: (restaurant generation rate applied)	0.005 pounds per day per SF
225 SF Mobile Food Carts: (restaurant generation rate applied)	0.005 pounds per day per SF

= 36.395 pounds per day or 6.64 tons per year.

Waste is disposed of through municipal solid waste service provided by Burrtec Waste Company; solid waste is picked up every week through an onsite dumpster. According to the San Bernardino County Countywide Plan EIR, after waste is collected, it is delivered to the Landers Sanitary Landfill. The Landers Sanitary Landfill has adequate capacity to handle the waste generated at the Pioneertown Soundstage Project. According to the CalRecycle, the maximum permitted capacity of Landers Sanitary Landfill is 13,983,500 Cubic Yards (CY), while its remaining capacity is 11,063,811 CY; the Landers Sanitary Landfill can accept 1,200 tons per day.[26] The County based its environmental impact forecasts on the projected increase in solid waste generation of 280,626 pounds per day at Build-Out of the Countywide Plan in the East Desert Region. The proposed project would generate, in total, 36.395 pounds of waste per day, which, without the mandatory waste diversion of 75% required to comply with AB 939 and AB 341 by 2020, would consist 0.0032% of the increased solid waste generation within the East Desert Region of the County at Build-Out.

[25] CalRecycle, 2025. Solid Waste Generation Rates.
https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates (accessed 06/19/25)
[26] CalRecycle, 2025. Landers Sanitary Landfill (36-AA-057)
https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1882?siteID=2664 (accessed 04/20/25)

Construction would not require demolition of any structures, though it would require some renovation of the interiors of the existing Pioneertown Soundstage and Pioneertown Gazette structures, and the removal of any construction and demolition waste (C&D) can be transported to a C&D waste collection facility, such as one of the many C&D collection facilities listed on San Bernardino County's Construction & Demolition Waste Recycling Guide.[27] There is adequate capacity at the nearest landfill as well as in other landfills that serve the area to handle construction and operational waste from the proposed project. Any hazardous materials collected on the project site during construction of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Furthermore, new projects will be constructed in accordance with the CALGreen Code, which requires a minimum of 65 percent of the "non-hazardous construction and demolition debris" (by weight or volume) to be recycled or reused. Therefore, it is expected that implementation of the project will be served by landfills with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Any impacts under this issue are considered less than significant.

e. *Less Than Significant Impact* – All collection, transportation, and disposal of any solid waste generated by the proposed project is required to comply with all applicable federal, state, and local regulations. Solid waste produced in this area of the County is collected and transported by the Burrtec. The area is served by several nearby landfills, though the closest is Landers Landfill, which, as stated under Threshold XIX(d) above, have adequate capacity to serve the project. New projects will also store and collect recyclable materials in compliance with AB 341. Green waste will be handled in accordance with AB 1826. As this project would be developed after 2022, the project must comply with the County's implementation plan for compliance with SB 1383, which establishes methane reduction targets for California. California SB 1383 sets goals to reduce disposal of organic waste in landfills, including edible food. The bill's purpose is to reduce GHG emissions, such as methane, and address food insecurity in California. This requires jurisdictions to implement mandatory organic waste collection and recycling in a Statewide effort to divert organic waste from landfills with goals to:

- Reduce organic waste disposal by 50% by 2020 and 75% by 2025 and
- Recover at least 20% of currently disposed surplus edible food by 2025.

Any hazardous materials collected on the project site during either construction or operation of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider, as stated under Threshold VIII, Hazards and Hazardous Materials above. Furthermore, new projects will be constructed in accordance with the CALGreen Code, which, as stated under Threshold XIX(d), above, requires a minimum of 65 percent of the "non-hazardous construction and demolition debris" (by weight or volume) to be recycled or reused. As such, the construction contract for this project will require C&D material from rehabilitation of the Pioneertown Soundstage and Pioneertown Gazette structures to be recycled in a manner that allows for reuse of these materials. All wood and other vegetation that is reusable shall be recycled or composted, where applicable.

[27] San Bernardino County, 2021. Construction & Demolition Waste Recycling Guide https://www.sbcounty.gov/uploads/DPW/docs/RecyclingGuide-2021.pdf (accessed 09/20/25)

Thus, the amount and types of waste that will be generated both during construction and operation of the project, the potential impacts to the waste disposal systems are considered less than significant. Therefore, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. No mitigation is necessary.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: 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?	☐	☐	☒	☐
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 wildfire?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – According to the CAL FIRE Fire Hazard Severity Zone Viewer Map (**Figure IX-4**), the proposed project is located in an area with Moderate wildfire risk and is located within a State Responsibility Area (SRA). The proposed project does not include the use of any flammable or explosive materials. As stated under Section XVII, Transportation, under Threshold (d), As shown on the Evacuation Route Map prepared for the San Bernardino Countywide Plan (**Figure IX-3**), the adopted evacuation routes in the area are Highway 62 to the southeast of the project site, and Highway 247 to the east of the project site. A de facto evacuation route in the vicinity of the project site would be Pioneertown Road, which traverses through the community. The proposed project is not located along a County identified emergency route, nor would implementation of the project impede emergency response from accessing the site or surrounding area. Additionally, the proposed project would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. The project is located within a moderate fire hazard severity zone and impacts to emergency response and/or emergency evacuation plans are considered less than significant, especially given the low density of vegetation on and adjacent to the project site. No mitigation required.

b. *Less Than Significant Impact* – The proposed project consists of rehabilitation and utilization of the existing Pioneertown Soundstage and Pioneertown Gazette, including installation of a new electrical

panel to meet the CBC and Fire Code, as well as installation of a shaded outdoor dining area, modular structures serving as restrooms, snack carts, and a mobile kitchen, and parking. The site itself primarily supports commercial development associated with the existing Pioneertown Soundstage, Pioneertown Gazette and several retail establishments with associated infrastructure and unpaved parking areas and also supports narrow swaths of undeveloped land that are periodically cleared of vegetation in association with routine weed abatement activities and infrastructure maintenance. The site itself is flat, and as a result, topography would not present exacerbated wildfire conditions. Further, as the site does not contain substantial vegetation, and will contain only maintained native vegetation once the proposed improvements are implemented, the onsite vegetation would not exacerbate wildfire conditions at the project site. Wind in the project area ranges from about 11 miles per hour (mph) to 13.3 mph,[28] and the National Weather Service defines a "gentle breeze" as 8-12 mph, with a "moderate breeze" as 13-18 mph.[29] As the project The proposed project is surrounded by residential and commercial development in all directions. Given the minimal potential for wildfire within the project site and project area because the proposed project is located only in a moderate FHSZ, rather than a high or very high FHSZ, and the lack of fuel necessary to result in uncontrolled spread of wildfire, there is a less than significant potential for the proposed project to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Impacts under this issue are considered less than significant. No mitigation is required.

c. *Less Than Significant Impact* – The project will utilize existing utility connections to support the expanded site use. As discussed under Threshold XIX(a), Utilities and Service Systems, above, the proposed project is not anticipated to result in a need for extension of utilities to serve the proposed project beyond those that are presently utilized in support of existing site operations. Construction itself is not anticipated to be a construction activity with significant fire risk, as the project site itself has been developed with only minimal vegetation. The proposed project would not result in any ongoing impacts to the environment that would exacerbate fire risk. Furthermore, the proposed project is a mixed commercial/restaurant use that will be designed in accordance with fire department recommendations and to County design standards. Therefore, the project would have a less than significant potential to exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts under this issue are considered less than significant.

d. *No Impact* – The proposed project is located within a site that is relatively flat. The discussion under Section VII, Geology and Soils, concluded that the project would not have a significant potential to experience landslides or slope instability, particularly given that this project area has not been delineated as containing potential for landslides or slope instability by the San Bernardino Countywide Plan. The proposed project is located in an area that has not been historically subject to flooding and based on the fact that the Preliminary Hydrology Study provided as **Appendix 4** indicates that the proposed improvements would not increase peak discharges and would not necessitate any attenuation of flows, the development of the Pioneertown Soundstage Project at this site is anticipated to have no potential to expose people or structures to significant risks,

[28] Wanderlog, 2025. Pioneertown Weather. https://wanderlog.com/weather/70633/3/pioneertown-weather-in-march#:~:text=Historically%2C%20the%20wind%20in%20Pioneertown,mph%207.5%20mph%2014.9%20mph (Accessed 09/20/25)
[29] National Weather Service, 2025. Estimating Wind Season. https://www.weather.gov/pqr/wind (Accessed 09/20/25)

including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

SUBSTANTIATION

The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control potentially significant environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The project has no potential to cause a significant impact to any biological or cultural resources. The project has been identified as having no potential to substantially degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The project requires mitigation to prevent significant biological resources impacts from occurring as a result of implementation of the project, including mitigation to minimize potential impacts to western Joshua tree and nesting birds through the implementation of **MMs BIO-1 and BIO-4**. This is because the proposed project site contains 6

Western Joshua Trees, **MMs BIO-1 through BIO-3** to protect the trees in place is necessary to minimize impacts to this species. Further, a pre-construction nesting bird clearance survey through **MM BIO-4** shall be conducted prior to ground disturbance to minimize impacts to nesting birds.

No archaeological sites or isolates were found to be located within the project boundaries during the field review of the project area. Thus, none of them requires further consideration. However, if potentially significant archaeological materials are encountered during construction, all work should be halted in the vicinity of the discovery until a qualified archaeologist can assess the significance and integrity of the find, which will ensure that impacts to archaeological resources would be minimized to a level of less than significant. This shall be enforced through the implementation of **MM CUL-2.** Further, because the Pioneertown Mane Street Historic District is a Historic Property and a Historical Resource, any proposed project activities should be consistent with "plans for rehabilitation to ensure that the undertaking maintains consistency with the Secretary of the Interior Standards for the Treatment of Historic Properties."[30] Thus, **MM CUL-1** must be implemented to ensure that the standards for developing the proposed project align with the Secretary of Interior Standards, thereby ensuring that the proposed project preserves the historic nature of the structures on site, and thereby would not substantially alter a historic property such that a significant scenic impact would result. Thus, the proposed project would have a less than significant 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. Please see biological and cultural sections (Sections IV and V) of this Initial Study.

b. *Less Than Significant With Mitigation Incorporated* – The project has 8 potential impact categories that are individually limited but may be cumulatively considerable. These are: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Hydrology & Water Quality, Noise, and Tribal Cultural Resources. The project is not considered growth-inducing, as defined by the *CEQA Guidelines*. These referenced issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no potential significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, less than significant impacts.

c. *Less Than Significant With Mitigation Incorporated* – The project will achieve long-term community goals by providing additional opportunities for employment, and revenue generating uses within the Mojave Desert Region of San Bernardino County. Furthermore, this project will provide a use consistent with those that serve the growing tourism of Pioneertown. The short-term impacts associated with the project, which are mainly construction-related impacts, are less than significant with mitigation as prescribed, and the proposed project would be compatible with long-term environmental protection. The issues of Air Quality, Geology & Soils, and Noise require the implementation of mitigation measures to reduce human impacts to a less than significant level. All

[30] 36 CFR part 68; see http://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm (Accessed 02/10/26)

other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the latest Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Agriculture & Forestry, Energy, Greenhouse Gases, Hazards & Hazardous Materials, Land Use & Planning, Mineral Resources, Population & Housing, Public Services, Recreation, Transportation, Utilities & Service Systems and Wildfire. The issues of Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Hydrology & Water Quality, Noise, and Tribal Cultural Resources require the implementation of mitigation measures as prescribed to reduce project specific and cumulative impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact level.

Based on the evidence and findings in this Initial Study, San Bernardino County proposes to adopt a Mitigated Negative Declaration for the Pioneertown Soundstage Project. A Notice of Intent to Adopt a Mitigation Negative Declaration (NOI) will be issued for this project by the County. The Initial Study and NOI will be circulated for 30 days of public comment. At the end of the 30-day review period, a final MND package will be prepared, and it will be reviewed by the County for possible adoption at a future County Planning Commission meeting, the date for which has yet to be determined. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*,(1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; San *Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2019
Authority: Public Resources Code sections 21083 and 21083.09
Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

Air Quality

AQ-1 **The following measures shall be incorporated into project plans and specifications for implementation:**

- **Apply soil stabilizers such as hay bales or aggregate cover to inactive areas.**
- **Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.**
- **Stabilize previously disturbed areas if subsequent construction is delayed.**
- **Water exposed surfaces and haul roads 3 times/day.**
- **Cover all stockpiles with tarps.**
- **Replace ground cover in disturbed areas quickly.**
- **Reduce speeds on unpaved roads to less than 15 mph.**
- **Trenches shall be left exposed for as short a time as possible.**

AQ-2 **The following signage shall be erected no later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:**

"[Site Name] {four-inch text}
[project Name/project Number] {four-inch text}
IF YOU SEE DUST COMING FROM {four-inch text}
THIS PROJECT CALL: {six-inch text}
[Contact Name], PHONE NUMBER {six-inch text}
If you do not receive a response, Please Call {three-inch text} The MDAQMD at 1-800-635-4617 {three-inch text}"

AQ-3 **During project construction a (minimum) 3,000-gallon water truck shall be available on-site at all times for dust control.**

AQ-4 **During construction, wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting.**

AQ-5 **The Developer shall use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. If the site contains exposed sand or fines deposits (and if the project would expose such soils through earthmoving), water application or chemical stabilization will be required to eliminate visible dust/sand from sand/fines deposits.**

AQ-6 **The Developer shall formulate a high wind response plan that addresses enhanced dust control if winds are forecast to exceed 25-mph in any upcoming 24-hour period.**

Biological Resources

BIO-1 **Construction fencing 4" or higher shall be installed around western Joshua Trees a minimum of 1' around the trees that are within 50 feet of construction activities, unless a tree is located on a neighboring property and there is an existing fence between the neighboring property. Fencing shall be maintained throughout construction and shall be removed at the conclusion of construction. Signs shall be posted at each tree indicating protection of the trees.**

BIO-2 **Heavy construction equipment shall not be operated or stored within the western Joshua tree protection area delineated by the construction fencing required by MM BIO-1, unless a tree is located on a neighboring property and there is an existing fence between the neighboring property. Construction equipment and materials shall be stored at least 50 feet from any western Joshua tree and to protect the tree's root zone, no trenching, removal, or addition of soil shall occur within this same buffer.**

BIO-3 **The western Joshua tree is a candidate threatened species under the California Endangered Species Act. Prior to the initiation of western Joshua tree removal, relocation, replanting, trimming, or pruning or any activity that may result in take of WJT, the Developer shall obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081b of the CESA, or under the Western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927- 1927.12). California Fish and Game Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". Mitigation for CESA will occur at a minimum 1:1 or per the stem count per the WJTCA census in lieu fee.**

BIO-4 **Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined whether the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately**

until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Cultural Resources

CUL-1 The proposed project shall be designed to be consistent with the plans for rehabilitation to ensure that the undertaking maintains consistency with the "Secretary of the Interior Standards for the Treatment of Historic Properties" (36 CFR part 68; see http://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm).

Further, the recommendations presented in CRM TECH's Historic Building Study and CEQA-Compliance Analysis (Appendix 3b) shall be enforced and incorporated into the project design. These are:

1. **A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**
2. **The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**
3. **Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.**
4. **Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.**
5. **Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.**
6. **Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**
7. **Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.**
8. **Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.**
9. **New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**
10. **New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.**

Regarding the property treatment of historic buildings during "work that must be done to meet accessibility and life-safety requirements," guidelines for implementing the Secretary of the Interior's Standards offer the following recommendations that shall be implemented by the Developer of the project (Weeks and Grimmer 2017:69):

- **Identify the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work.**
- **Comply with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.**
- **Work with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a historic building, its site, and setting.**
- **Provide barrier-free access that promotes independence for the user while preserving significant historic features.**
- **Find solutions to meet accessibility requirements that minimize the impact of any necessary alteration for accessibility on the historic building, its site, or setting, such as compatible ramps, paths, and lifts.**

The developer shall demonstrate consistency with 36 CFR part 68 standards in the plans for development submitted to the County, and plans must be approved by the County prior to construction.

CUL-2 Should any cultural resources be encountered during construction of the project, earthmoving or grading activities in the immediate area of the finds shall be halted and an on-site inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the on-site archaeological professional, who is acceptable to the County and retained by the Applicant. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

Geology and Soils

GEO-1 All mass grading, excavation, drilling, and trenching activities within the site, shall be monitored part-time for paleontological resources, on an as-needed basis, as determined by the project paleontologist. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the paleontologist of record, representatives of the grading contractor and subcontractors, the project owner or developer, and a representative of the lead agency. The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials. A qualified paleontologist shall monitor earth disturbance activities for potential paleontological resource and shall have the authority and responsibility to halt or divert grading operations. The paleontological principal investigator shall notify the County of any fossil discoveries by email and/or phone call. The monitor shall be prepared to quickly salvage fossils, if they are unearthed, to avoid

construction delays, but must have the power to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.
Collected samples of sediment shall be processed to recover small fossils, and all recovered specimens shall be identified and curated at a repository with permanent retrievable storage.

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the procedures outlined above. The report shall include a discussion of the significance of the paleontological findings, if any. The report and the inventory, when approved by San Bernardino County, would signify completion of the program to mitigate potential impacts on paleontological resources. Under these conditions, the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.

Hydrology and Water Quality

HYD-1 The Applicant shall require that the construction contractor implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the Developer include the following:

- **The use of silt fences or coir rolls;**
- **The use of temporary stormwater desilting or retention basins;**
- **The use of water bars to reduce the velocity of stormwater runoff;**
- **The use of wheel washers on construction equipment leaving the site;**
- **The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;**
- **The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and**
- **Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.**

Noise

NOI-1 The Applicant shall implement the following measures during construction:

- As necessary, the project applicant shall use supplemental measures to reduce the construction noise levels to comply with requirements specified in the County Development Code. These measures may include, but are not limited to, the erection of noise barriers/curtains, use of advanced or state-of-the-art mufflers on construction equipment, and/or reduction in the amount of equipment that would operate concurrently at the construction site.

- Place noise and groundborne vibration-generating construction activities whose specific location on a construction site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise- and vibration-sensitive land uses such as residences, schools, and hospitals.
- Minimize the effects of equipment with the greatest peak noise generation potential via shrouding or shielding to the extent feasible. Examples include the use of drills, pavement breakers, and jackhammers.
- Provide noise shielding and muffling devices on construction equipment per the manufacturer's specifications.
- Identify a liaison for surrounding residents and property owners to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.
- Notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least two weeks prior to groundbreaking.

Construction activities shall occur within the hours considered to be acceptable for construction by the applicable jurisdiction within which an individual project is constructed, except for emergencies.

NOI-2 The County shall require the Applicant's construction contractor(s) to implement the following measures:

- Ensure that the operation of construction equipment that generates high levels of vibration including, but not limited to, large bulldozers, loaded trucks, pile-drivers, vibratory compactors, and drilling rigs, is minimized to below 80 vibration decibels (VdB), within 45 feet of existing residential structures and 35 feet of institutional structures (e.g., schools) during construction. Use of small rubber-tired bulldozers shall be enforced within these areas during grading operations to reduce vibration effects.
- The construction contractor shall provide signs along the roadway identifying a phone number for adjacent property owners to contact with any complaint. During future construction activities with heavy equipment within 100 feet of occupied residences, vibration field tests shall be conducted at the property line near the nearest occupied residences. If vibrations exceed 80 VdB, the construction activities shall be revised to reduce vibration below this threshold. These measures may include but are not limited to the following: use different construction methods, slow down construction activity, or other mitigating measures to reduce vibration at the property from where the complaint was received.

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EXHIBIT E

Mitigation Monitoring and Reporting Program
Initial Study/Mitigated Negative Declaration
PIONEERTOWN SOUNDSTAGE PROJECT – PROJ-2022-00191

Prepared by:

County of San Bernardino, Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, California 92415-0182
Contact: Luis Rodriquez, Contract Planning

JUNE 2026

Table of Contents

SECTION		PAGE NO.
1	INTRODUCTION	1
2	MITIGATION MONITORING AND REPORTING PROGRAM TABLE	3

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1 Introduction

The California Environmental Quality Act (CEQA) requires that a public agency adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented after project approval. The lead or responsible agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6(a)(1)).

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the County of San Bernardino (County) to ensure compliance with adopted mitigation measures identified in the MND for the Pioneertown Soundstage Project – PROJ-2022-00191 when construction begins. The County, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Hydrology & Water Quality, Noise, and Tribal Cultural Resources.

The remainder of this MMRP consists of a table that identifies the mitigation measures by resource for each project component. Table 1 identifies the mitigation monitoring and reporting requirements, list of mitigation measures, party responsible for implementing mitigation measures, timing for implementation of mitigation measures, agency responsible for monitoring of implementation, and date of completion. With the MND and related documents, this MMRP will be kept on file at the following location:

County of San Bernardino
385 N. Arrowhead Avenue, First Floor
San Bernardino, California 92415

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2 Mitigation Monitoring and Reporting Program Table

Table 1 Mitigation Monitoring and Reporting Program[1]

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Air Quality				
AQ-1: The following measures shall be incorporated into Project plans and specifications for implementation: • Apply soil stabilizers such as hay bales or aggregate cover to inactive areas. • Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph. • Stabilize previously disturbed areas if subsequent construction is delayed. • Water exposed surfaces and haul roads 3 times/day. • Cover all stockpiles with tarps. • Replace ground cover in disturbed areas quickly. • Reduce speeds on unpaved roads to less than 15 mph. • Trenches shall be left exposed for as short a time as possible.	This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction	Project applicant and their construction contractor	County of San Bernardino	
AQ-2: The following signage shall be erected no later than the commencement of construction: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day: "[Site Name] {four-inch text} [project Name/project Number] {four-inch text} IF YOU SEE DUST COMING FROM {four-inch text} THIS PROJECT CALL: {six-inch text} [Contact Name], PHONE NUMBER {six-inch text}	This measure shall be included in the construc-tion contract as a contract specification and implemented by the contractor during construction.	Project applicant and their construction contractor	County of San Bernardino	

[1] Revisions to the Mitigation Measures from the responses to comments are bolded. Additional are underlined, omissions are in strikeout.

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
If you do not receive a response, Please Call {three-inch text} The MDAQMD at 1-800-635-4617 {three-inch text}"				
AQ-3: During project construction a (minimum) 3,000-gallon water truck shall be available on-site at all times for dust control.	This measure shall be included in the construc-tion contract as a contract specification and implemented by the contractor during construction.	Project applicant and their construction contractor	County of San Bernardino	
AQ-4: During construction, wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting.	This measure shall be included in the construc-tion contract as a contract specification and implemented by the contractor during construction.	Project applicant and their construction contractor	County of San Bernardino	
AQ-5: The Developer shall use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. If the site contains exposed sand or fines deposits (and if the project would expose such soils through earthmoving), water application or chemical stabilization will be required to eliminate visible dust/sand from sand/fines deposits.	This measure shall be included in the construc-tion contract as a contract specification and implemented by the contractor during construction.	Project applicant and their construction contractor	County of San Bernardino	
AQ-6: The Developer shall formulate a high wind response plan that addresses enhanced dust control if winds are forecast to exceed 25-mph in any upcoming 24-hour period.	The plan shall be developed prior to construction and shall cover	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
	construction and operational activities. This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction. It also shall be enforced during operation of the project.			
Biological Resources				
BIO-1: Construction fencing 4" or higher shall be installed around western Joshua Trees a minimum of 1' around the trees that are within 50 feet of construction activities, unless a tree is located on a neighboring property and there is an existing fence between the neighboring property. Fencing shall be maintained throughout construction, and shall be removed at the conclusion of construction. Signs shall be posted at each tree indicating protection of the trees.	This measure shall be implemented prior ground breaking for construction and shall be carried out throughout the whole of construction	Project applicant and the construction contractor	County of San Bernardino	
BIO-2: Heavy construction equipment shall not be operated or stored within the western Joshua tree protection area delineated by the construction fencing required by MM BIO-1, unless a tree is located on a neighboring property and there is an existing fence between the neighboring property. Construction equipment and materials shall be stored at least 50 feet from any western Joshua tree and to protect the	This measure shall be implemented during construction and shall be carried out throughout	Project applicant and the construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
tree's root zone, no trenching, removal, or addition of soil shall occur within this same buffer.	the whole of construction			
BIO-3: The western Joshua tree is a candidate threatened species under the California Endangered Species Act. Prior to the initiation of western Joshua tree removal, relocation, replanting, trimming, or pruning or any activity that may result in take of WJT, the Developer shall obtain California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Section 2081b of the CESA, or under the Western Joshua Tree Conservation Act (WJTCA) of Fish and Game Code (§§ 1927- 1927.12). California Fish and Game Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". Mitigation for CESA will occur at a minimum 1:1 or per the stem count per the WJTCA census in lieu fee.	This measure shall be implemented if Joshua trees are removed, relocated, replated, trimmed, or pruned, etc., during construction and shall be enforced throughout the life of the project	Project applicant and their biologist	County of San Bernardino	
BIO-4: Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project areas (including access routes) and a 500-foot buffer surrounding the Project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the Project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an	This measure shall be implemented prior or during to initiation of construction depending on the specifications of the measure. Any mitigation measures that are identified shall be implemented in the time frame specified by the qualified biologist.	Project applicant and their Biologist	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.				
Cultural Resources				
CUL-1: The proposed project shall be designed to be consistent with the plans for rehabilitation to ensure that the undertaking maintains consistency with the "Secretary of the Interior Standards for the Treatment of Historic Properties" (36 CFR part 68; see http://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm). Further, the recommendations presented in CRM TECH's Historic Building Study and CEQA-Compliance Analysis (Appendix 3b) shall be enforced and incorporated into the project design. These are: 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment. 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided. 3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken. 4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.	This measure shall be carried out during project design	Project Applicant, its architect, and County Building Permit Issuer/Plan Check	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved. 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence. 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible. 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken. 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. Regarding the property treatment of historic buildings during "work that must be done to meet accessibility and life-safety requirements," guidelines for implementing the Secretary of the Interior's Standards offer the following recommendations that shall be implemented by the Developer of the project (Weeks and Grimmer 2017:69): • Identify the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
the site and setting which may be affected by accessibility code-required work. • Comply with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible. • Work with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a historic building, its site, and setting. • Provide barrier-free access that promotes independence for the user while preserving significant historic features. • Find solutions to meet accessibility requirements that minimize the impact of any necessary alteration for accessibility on the historic building, its site, or setting, such as compatible ramps, paths, and lifts. The developer shall demonstrate consistency with 36 CFR part 68 standards in the plans for development submitted to the County, and plans must be approved by the County prior to construction.				
CUL-2: Should any cultural resources be encountered during construction of the project, earthmoving or grading activities in the immediate area of the finds shall be halted and an on-site inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the on-site archaeological professional, who is acceptable to the County and retained by the Applicant. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.	Any response to exposed resources shall occur during construction. Any reports documenting management and findings for accidentally exposed resources shall be completed within one year of the discovery.	Project applicant and their construction contractor	County of San Bernardino and Project Applicant/Contractor	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Geology and Soils				
MM GEO-1: All mass grading, excavation, drilling, and trenching activities within the site, shall be monitored part-time for paleontological resources, on an as-needed basis, as determined by the project paleontologist. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the paleontologist of record, representatives of the grading contractor and subcontractors, the project owner or developer, and a representative of the lead agency. The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials. A qualified paleontologist shall monitor earth disturbance activities for potential paleontological resource, and shall have the authority and responsibility to halt or divert grading operations. The paleontological principal investigator shall notify the County of any fossil discoveries by email and/or phone call. The monitor shall be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must have the power to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens. Collected samples of sediment shall be processed to recover small fossils, and all recovered specimens shall be identified and curated at a repository with permanent retrievable storage. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the procedures outlined above. The report shall include a discussion of the significance of the paleontological findings, if any. The report and the inventory, when approved by San Bernardino County, would signify completion of the program to mitigate potential impacts on paleontological resources. Under these conditions, the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.	The monitor shall be retained for the duration of ground disturbing activities as a contract specification and implemented by the contractor during construction. Any response to exposed resources shall occur during construction. Any reports documenting management and findings for accidentally exposed resources shall be completed within one year of the discovery,	Project applicant and their construction contractor	County of San Bernardino and Project Applicant/Contractor	
Hydrology and Water Quality				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
HYD-1: The Applicant shall require that the construction contractor to implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the Developer include the following: • The use of silt fences or coir rolls; • The use of temporary stormwater desilting or retention basins; • The use of water bars to reduce the velocity of stormwater runoff; • The use of wheel washers on construction equipment leaving the site; • The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads; • The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and • Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.	This measure shall be implemented during construction and included in the contract with the construction contractor.	Project applicant and their construction contractor	County of San Bernardino	
Noise				
NOI-1: The Applicant shall implement the following measures during construction: • As necessary, the project applicant shall use supplemental measures to reduce the construction noise levels to comply with requirements specified in the County Development Code. These measures may include, but are not limited to, the erection of noise barriers/curtains, use of advanced or state-of-the-art	This measure shall be implemented during construction and included in the contract with the	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
mufflers on construction equipment, and/or reduction in the amount of equipment that would operate concurrently at the construction site. • Place noise and groundborne vibration-generating construction activities whose specific location on a construction site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise- and vibration-sensitive land uses such as residences, schools, and hospitals. • Minimize the effects of equipment with the greatest peak noise generation potential via shrouding or shielding to the extent feasible. Examples include the use of drills, pavement breakers, and jackhammers. • Provide noise shielding and muffling devices on construction equipment per the manufacturer's specifications. • Identify a liaison for surrounding residents and property owners to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations. • Notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least two weeks prior to groundbreaking. Construction activities shall occur within the hours considered to be acceptable for construction by the applicable jurisdiction within which an individual project is constructed, except for emergencies.	construction contractor.			
NOI-2: The County shall require the Applicant's construction contractor(s) to implement the following measures: • Ensure that the operation of construction equipment that generates high levels of vibration including, but not limited to, large bulldozers, loaded trucks, pile-drivers, vibratory compactors, and drilling rigs, is minimized to below 80 vibration decibels (VdB), within 45 feet of existing residential structures and 35 feet of institutional structures (e.g., schools) during construction. Use of small rubber-tired bulldozers shall be	This measure shall be implemented during construction and included in the contract with the construction contractor.	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
enforced within these areas during grading operations to reduce vibration effects. • The construction contractor shall provide signs along the roadway identifying a phone number for adjacent property owners to contact with any complaint. During future construction activities with heavy equipment within 100 feet of occupied residences, vibration field tests shall be conducted at the property line near the nearest occupied residences. If vibrations exceed 80 VdB, the construction activities shall be revised to reduce vibration below this threshold. These measures may include, but are not limited to the following: use different construction methods, slow down construction activity, or other mitigating measures to reduce vibration at the property from where the complaint was received.				

EXHIBIT F

From: Sean Noonan
To: Rodriguez, Luis
Subject: Comments on the ISMND for the Pioneertown Soundstage (PROJ-2022-00191)
Date: Tuesday, February 24, 2026 12:50:11 PM

You don't often get email from smartgrowthsean@gmail.com. Learn why this is important

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

Hello - I am reaching out to provide the following comments on the IS/MND for this project. I appreciate your time in reviewing these comments. Please let me know when the public hearing is scheduled for this project as I did not see this information currently available in the IS, NOC, or NOA. Thanks!

- The Transportation Screening Assessment and the Initial Study for this project state the following:
    - *"The San Bernardino County adopted analytical procedures, screening tools and impact thresholds for VMT, which are documented in the San Bernardino County Transportation Impact Study Guidelines (July 2019) (County Guidelines). The County Guidelines provides details on appropriate criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following types: x Project Type Screening x Transit Priority Area (TPA) Screening x Low VMT Area A land use project needs only to meet one of the above screening thresholds to result in a less than significant impact. The proposed project appears to meet the Project Type Screening for the following reasons: The project consists of redeveloping an existing historically themed retail area with less than 10,000 square feet increase in retail services. The Office of Planning and Research (OPR)(now Office of Land Use and Climate Innovation) Technical Advisory provides a categorical exemption for existing facilities including additions to existing structures of up to 10,000 square feet. The community outdoor dining gathering pavilion provides supplemental services for the existing historically themed services. Based on the size and hours of operation of the supplemental services, they would not be significantly relevant outside the local area, and they provide retail services with less than 50,000 square feet for the local themed retail area. Therefore, this screening criteria is met and VMT impacts would be less than significant."*

- The Project's IS/MND goes on to conclude that the project would have less than significant impacts related to VMT given that the project would consist of 10,000 square feet or less of addition to an existing building.
- Issue #1. The County's TIA guidelines allow developers to use VMT screening criteria that were struck down in 2025 - particularly, the practice of exempting projects just because they are listed in the 2018 OPR Technical Advisory, which itself was not supported by any actual data or rationale.
- Issue #2. The County's IS/MND and supporting technical studies do not

provide any justification as to why a project consisting of 10,000 square feet or less of space would have less than significant impacts related to VMT. There is no information provided whatsoever that analyzes this project in particular beyond the screening step, which was previously struck down. This leads to the project's VMT not being analyzed and VMT mitigation measures not being prescribed that may actually be warranted for this project. We don't know until you actually study it! The County has an obligation under CEQA to analyze and mitigate a project's impacts. I believe that the information I have provided to the County herein constitutes a fair argument that the project's environmental effects have not been fully evaluated as required by CEQA.

- Further supporting analysis follows...
- Specifically, my comment references the published opinion filed March 27, 2025 by the Fourth District Court of Appeal (Div. 1) that reversed an earlier trial court's judgment denying a writ petition. In the published decision, the Fourth District Court of Appeal held that two screening thresholds of significance for VMT impacts adopted by the County of San Diego as part of its 2022 Transportation Study Guide were invalid because they were unsupported by any substantial evidence. *Cleveland National Forest Foundation, et al. v. County of San Diego* (2025) 109 Cal.App.5th 1257.
- It is my opinion that the County is improperly depending upon the very same screening thresholds that were struck down in this case within the Project's IS/MND. As a result of this deficiency in the VMT analysis conducted for this project, the IS/MND is incomplete.
- As such, I request that the County please update the VMT assessment for this project to actually include an analysis of the project's VMT effects and apply VMT mitigation if needed.
- Also, once this information is prepared, I request that the IS/MND be updated and recirculated for public review in accordance with the requirements contained in State CEQA Guidelines Section 15162, which requires recirculation of an Initial Study when new information of substantial importance is raised that was not included in the public review document.

If you have any questions on these comments, feel free to reach out.

Thanks,
--
Sean Noonan

From: Ben Loescher
To: Rodriguez, Luis
Subject: Re: Sound Stage Proposal
Date: Thursday, February 26, 2026 8:30:53 AM
Attachments: image001.png

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

Thanks Luis,

One Immediate question: The trip report appears to suggest no additional trips generated by the nightclub/event us, and while no parking calculation is provided, I cannot see anyway, that the quantity of parking in the proposed plan can serve the proposed uses in compliance with the development code standards. The owner‘s current use of this facility for this purpose has not been legally established, (County records indicates the established Use as Retail, the prior owner was issued Notices of Violation for unpermitted event uses. The current property owner might have a dozen or so unpermitted events per year - On what basis is this being considered Existing for purposes of this application? There is no history of ongoing events in anything close to what is proposed here on this site.

As I believe you are aware, parking and traffic are major concerns in Pioneertown, and they have been exacerbated by the owner’s unpermitted and intensified uses on his other properties.

Best,

Ben

On Wed, Feb 25, 2026 at 07:36 Rodriguez, Luis <Luis.Rodriguez@lus.sbcounty.gov> wrote:

> Hi Ben,
>
> Attached is the latest site plan. We have a meeting today with the applicant to discuss operations and status of the elevations. We currently only have pictures of the buildings. Let me know if you have any questions and/or comments.
>
> Have a great day,
>
> **Luis Rodriguez Jr.**
>
> Contract Planner
>
> Land Use Services Planning
>
> 909-387-8311

From: Ben Loescher <b.loescher@terrain.la>
Sent: Tuesday, February 24, 2026 6:30 PM
To: Rodriguez, Luis <Luis.Rodriguez@lus.sbcounty.gov>
Subject: Sound Stage Proposal

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

Hi Luis, I understand the draft IS/MND is now out for the Soundstage festival project. Are revised plans and elevations available?

Best,

Ben

P.S. We rebranded!

Ben Loescher AIA | LEED AP
Founding Principal
(310) 745-9211
b.loescher@terrain.la

Terrain

From: Kerrie Aley
To: Rodriguez, Luis
Subject: Pioneertown Soundstage- Initial Study
Date: Thursday, February 26, 2026 9:39:47 AM

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

Hello Luis Rodriguez,
It is my understanding that the Soundstage drawings and operational plan may be revised.
I was about to put up a neutral notice on the Pioneertown Facebook page about the opportunity for public comment on the Initial Study and the project.
I would rather hold off on this if the drawings and operation plan for this project will be revised. I do not want the neighbors to over-react about the environmental impacts if the project description is changing.

I'd like to review the new drawings, operational plan and any revisions to the Initial Study.
Also I like to request an extension on the review period for the Initial Study so that the public has adequate time to review the new material and provide accurate comments on the Initial Study and project.

I would be happy to meet with the applicant to discuss this project in detail.

Regards,
Kerrie Aley
Pioneertown

Mojave Desert Air Quality Management District
Brad Poiriez, *Executive Director*
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
www.MDAQMD.ca.gov • @MDAQMD

February 26, 2026

County of San Bernardino, Land Use Services Dept.
Luis Rodriguez, Planner
385 North Arrowhead Avenue
San Bernardino CA 92415

Subject: SBC PROJ-2022-00191

Mr. Rodriguez:

The Mojave Desert Air Quality Management District (District) has received the project notice for the proposed Pioneertown Motel Expansion project (PROJ-2022-00191). The proposed project includes a conditional use permit to renovate and operate event structure, coffee and ice cream shop, and construct an outdoor dining/gathering pavilion. The existing 6,223 sq. ft. Event buildings will be renovated to facilitate musical programming for residents and visitors of Pioneertown.

We have reviewed the project as proposed and based on the information available to us at this time, the District requires that fugitive dust best management practices (including but not limited to applicable provisions of District Rule 403) are implemented on all non-paved transport roads, access points, and parking areas. The District also requires that the proponent obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including, but not limited to; fuel storage and dispensing equipment, and internal combustion engines with a manufacture's maximum continuous rating greater than or equal to 50 brake horsepower. Additionally, an asbestos survey is required for any demolition or renovation of existing buildings. MDAQMD asbestos informational flowchart and notification forms are available at https://www.mdaqmd.ca.gov/permitting/asbestos-information.

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 1846, or Bertrand Gaschot at extension 4020.

Sincerely,

Chris Anderson
Planning and Air Monitoring Supervisor

CJA/bg SBC PROJ-2022-00191 2026 26 Feb

RECEIVED
FEB 27 ..:5
San Bernardino County
Planning Division

Colorado River Basin Regional Water Quality Control Board

March 3, 2026

Luis Rodriguez
County of San Bernardino
Planning Division
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA
92415-0187

Dear Applicant:

The Colorado River Basin Water Quality Control Board (Regional Water Board) has reviewed your Initial Study report for the Pioneertown Soundstage project located at 53585 Mane Street, in Pioneertown, California. The review is located on the following page.

If you have questions or concerns regarding any information presented here, please feel free to contact us at (760) 346-7491.

Thank you for your continued support and cooperation.

Colorado River Basin Regional Water Quality Control Board

Environmental Review Checklist

Project Name:	**PIONEERTOWN SOUNDSTAGE PROJECT**
Project Location:	**53585 Mane Street, Pioneertown, CA 92268**
Lead Agency:	**San Bernardino County**
Document Type:	**Initial Study**
Contact Person:	**Luis Rodriguez**
Email:	**Luis.Rodriguez@lus.sbcounty.gov**

[ ] The proposal does not provide enough information to meet the State Board On Site Wastewater Treatment Systems (Septic Systems) Policy and Local Agency Management Program. The information is accessible on the Regional Board Homepage (https://www.waterboards.ca.gov/coloradoriver/water_issues/programs/owts/)

[ ] The proposed project is located in an area where septic tank disposal systems are prohibited unless an exemption is requested and granted by the Regional Board.

[X] The project may require development of Stormwater Pollution Prevention Plan and NPDES General Industrial Stormwater Permit. This permit is accessible on the State Board's Homepage (https://www.waterboards.ca.gov/water_issues/programs/stormwater/). Best Management Practices must be used to mitigate project impacts.

[X] Should the construction encompass over one acre of soil disturbance, a Stormwater Pollution Prevention Plan and a NPDES General Construction Stormwater Permit will be required. This permit is accessible on the State Board's Homepage (https://www.waterboards.ca.gov/water_issues/programs/stormwater/). Best Management Practice must be used to mitigate project impacts.

[ ] The project appears to propose a discharge of waste to surface water. Therefore, an NPDES permit for the project may be necessary.

[X] The proposal contains features which may need to be regulated by the Regional Board. Please review the Water Quality Control Plan for the Colorado River Basin Water Board (Basin Plan) accessible on the Regional Board's homepage (https://www.waterboards.ca.gov/coloradoriver/water_issues/programs/basin_planning/).

[ ] Please require written confirmation that the project proponent obtain Regional Board concurrence before approving this project.

[ ] The project may require a Federal Clean Water Act Section 401 Water Quality Certification or State dredge or fill Waste Discharge Requirements (WDRs). The information can be accessible on the State Board's Homepage (https://www.waterboards.ca.gov/water_issues/programs/cwa401/) or Regional Board's Homepage (https://www.waterboards.ca.gov/coloradoriver/water_issues/programs/401_certification/)

[ ] The proposal does not provide specific information on impacts to wetlands or waters of the state. The Environmental Documentation needs to quantify these impacts. The Environmental Document must discuss alternatives such as avoidance, minimize disturbance and mitigation. Mitigation must be identified in environmental document including timing of construction.

[ ] Regional Board staff has determined that this project will not have a significant effect on water quality as proposed.

[ ] Regional Board staff will make additional comments after a more detailed review is complete.

[ ] Project may result in spills that will adversely impact ground and surface waters. Include a spill contingency plan in environmental document regarding mitigation.

[X] Other

The project is situated on an alluvial fan that is staggered with ephemeral streams and washes, located within the Black Rock Spring hydrologic Unit, in the city of Pioneertown, California. The soil in this area consists of coarse, permeable sediments, and the presence of septic systems on site will require careful best management practices to prevent groundwater contamination.

It is unclear from the initial study whether the project exceeds one acre of disturbance. If it does, then the project will require development of a Stormwater Pollution Prevention Plan (SWPPP) and National Discharge Elimination System (NPDES) General Industrial Stormwater Permit. Construction activities associated with this project may require the same permits.
These permits are accessible on the State Board's Homepage here: (https://www.waterboards.ca.gov/water_issues/programs/stormwater/).

Please review the Water Quality Control Plan for the Colorado River Basin Water Board (Basin Plan) accessible on the Regional Board's homepage (https://www.waterboards.ca.gov/coloradoriver/water_issues/programs/basin_planning/)

Review Staff: JG
Date:2/13/2026

Dear Sir, 3/2/26

I Am Writing you As A Resident of Princetown. I totally disagree with the use permit on Maine St, of a Perasco Coffee & Ice Cream shop to be built. We are a Sml. tourist town. The continued Building on Maine St. is upsetting to residents. This permit will make a huge influx. This will increase traffic, noise, trash & crime. What About increased parking ?!? Maine St. is a Private street, NO PUBLIC PARKING ! Does this person prepared for any security ?!?

Please Please DO NOT Give this person A Permit !!

Thank you,

A Concerned Resident

Public Comment Opposing Approval of the Pioneertown Soundstage Project – PROJ-2022-00191

To the San Bernardino County Planning Commission and Land Use Services Department:

I strongly object to approval of the **Pioneertown Soundstage Project – PROJ-2022-00191** and request that this comment be included in the administrative record. The Initial Study and supporting technical materials do not provide substantial evidence that this project is compatible with a small rural desert residential community or that its impacts have been adequately disclosed and analyzed.

This project is being presented as a restoration and improvement effort, but the record shows something much more significant: a late-night, high-intensity entertainment use with a Soundstage operating until **2:00 a.m. on Fridays, Saturdays, and Sundays**, a **maximum permitted occupancy of 500 persons**, an **enclosed outdoor patio**, a separate **outdoor dining/gathering pavilion**, new driveways onto Pioneertown Road, new exterior lighting, and a site plan that does not even provide the amount of parking the plan itself says is required. That is not a minor neighborhood-serving use. It is a destination event venue inserted into a small unincorporated desert community with nearby homes, dark skies, limited road infrastructure, and rural expectations of peace and quiet.

My objections are set forth below.

1. The noise study is unreliable, internally inconsistent, and should not be accepted as substantial evidence.

I am submitting this comment in part regarding the noise analysis contained in **Appendix 5 – Noise Study** referenced in the Initial Study. The County should not rely on that analysis in its current form. Based on the descriptions incorporated into the Initial Study, the noise analysis appears to contain significant inconsistencies, unsupported assumptions, and missing information that undermine its reliability and call into question its conclusion that the project will comply with County noise standards. The Initial Study itself makes clear that noise impacts are central to the project because the Soundstage's proposed operating hours extend to **2:00 a.m.** on weekends.

At the outset, the record is confusing as to what exactly is being analyzed. The Initial Study is for the **Pioneertown Soundstage Project**, yet related materials appear to use inconsistent naming conventions. A technical analysis used to support CEQA review must clearly and consistently identify the project, the actual use, and

the operating characteristics being modeled. Where the record is unclear or inconsistent on those basic points, confidence in the analysis is undermined.

2. The baseline noise methodology appears grossly inadequate for a late-night entertainment venue.

The project is proposed in a small rural desert community, yet the underlying noise approach appears to rely on a limited baseline that does not credibly represent the actual ambient conditions residents experience, especially at night. For a project involving entertainment, amplified music, crowd noise, parking activity, and late-night dispersal, a limited daytime sample is not enough. The Initial Study confirms that the Soundstage would host musical programming, weddings, events, and other activities, and it states that the noise study was prepared specifically to justify compliance with County daytime and nighttime limits. A conclusion of compliance based on narrow or incomplete baseline assumptions is not persuasive in this setting.

If the baseline relied on one short daytime reading, with no true nighttime monitoring of the rural ambient environment, then the study is plainly inadequate for evaluating a venue that may operate until 2:00 a.m. That type of methodology understates impact from bass, repetitive music beats, crowd voices, engine revving, vehicle doors, headlights, and patrons leaving late at night.

3. The receptor analysis is incomplete and fails to address affected homes to the north and west.

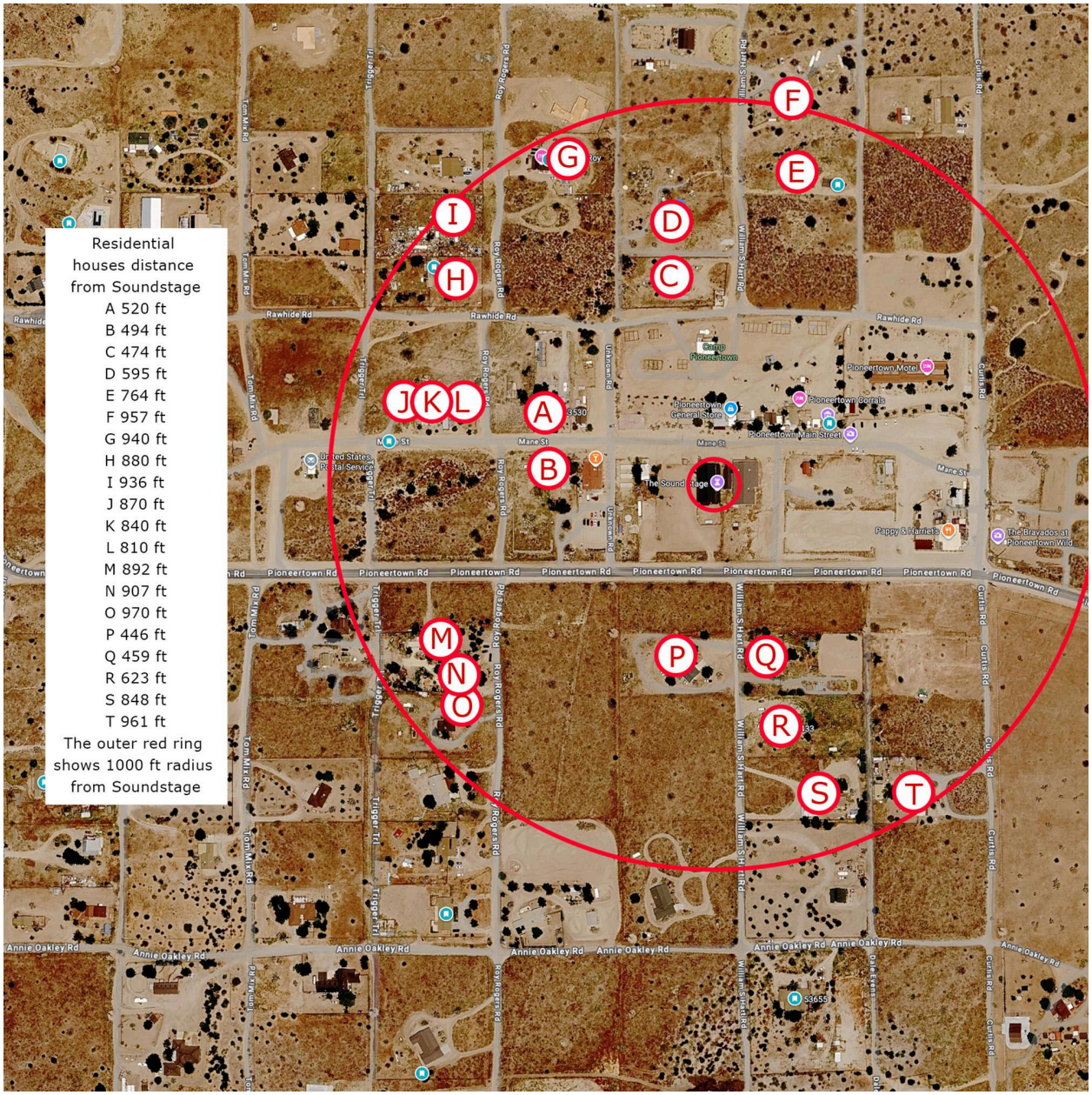
The Initial Study describes the site as bounded on the north by Mane Street with commercial development farther north, on the east by commercial development, on the south by Pioneertown Road with residential development farther south, and on the west by commercial development. Table 1 similarly identifies the west side as Red Dog Saloon and parking, and the south side as single-family residences. But that framing does not meaningfully evaluate homes located to the **north and west**, including the house to the west that is in the direct line of sight and direct line of sound from the Soundstage when the doors are open.

This omission is especially serious because the project photos in the Initial Study show the western and northern edges of the property and the surrounding development pattern, confirming that the area is not some isolated commercial island; it is part of a mixed rural setting with nearby structures and residences. The County cannot lawfully minimize noise impacts by selectively framing sensitive surroundings while failing to meaningfully analyze all nearby occupied homes.

Any meaningful noise study for this project should evaluate the nearest occupied residences in every relevant direction, especially those with direct line-of-sight or direct line-of-sound exposure to open Soundstage doors, amplified music, parking

turnover, event traffic, and after-hours crowd dispersal. A conclusion of compliance is not credible where receptor selection itself appears incomplete.

There are 20 residential houses located within 1,000 feet of the Soundstage (see appendix AA attached), and these homes have minimal or no obstacles, such as vegetation, that could reduce sound. Additionally, the area is situated in a square-mile valley surrounded by sawtooth hills that reflect sound into the residential community. All of these factors need to be taken into account, and it is essential to conduct actual, real-time sound analysis involving the 20 residents who are most affected by noise from the Soundstage.



Appendix AA. 20 residential houses within a 1000 ft radius of the Soundstage, with distances. Source Google Maps.

4. The study appears to rely on generalized modeling assumptions instead of real-world venue operations.
The project description confirms that the Soundstage would support musical programming, rented events, weddings, and other uses with up to **500 persons**, while employing as many as **30 part-time employees during events**. Yet there is no clear indication in the Initial Study that the noise analysis used real-world source measurements from comparable operations, actual crowd behavior assumptions, event dispersal conditions, speaker orientation details, or verified after-hours management practices.

That matters. Generic model inputs are not enough for a late-night event venue in a quiet rural setting. The actual impacts depend on what really happens: doors open, bass escaping, people congregating outside, idling vehicles, people talking in the parking area, headlights sweeping across nearby homes, and patrons leaving well after normal quiet hours. Those are not secondary details. They are central to the project's real effect on the community.

5. The parking assumptions are internally inconsistent and unrealistic for event operations.
The Initial Study states that the project would provide **55 automobile parking spaces**, including **5 ADA spaces**, plus **1 loading space**. But the site plan's parking calculation states that **70 spaces are required**. The same site plan shows a **total of 55 spaces** while separately stating the total required is 70. That is a glaring discrepancy in the project's own materials.

This matters because the parking and traffic noise assumptions appear artificially flattened and detached from how event venues actually function. Event venues do not generate one neat, low hourly average of parking activity. They generate concentrated peaks before and after performances. Engines start at once. Car doors slam. People gather, linger, and talk. Headlights sweep across neighboring properties. Overflow parking spills into adjacent areas and along rural roads. In a quiet desert community, those impacts can be among the most intrusive of all. A project with a documented parking shortfall should not be approved based on optimistic assumptions that ignore real-world event conditions.

6. Rural traffic and road access conditions are not suitable for a high-intensity venue.
The project would rely on **two new driveways** on Pioneertown Road, one entry-only and one exit-only. The site plan and project description also state that most of the parking and drive aisles would remain **unpaved compacted native**

soil, with only limited paved ADA parking. The transportation section of the Initial Study acknowledges there are no paved sidewalks along the adjoining roadway network in the area. That is not appropriate infrastructure for a high-intensity entertainment venue operating late into the night.

Pioneertown is a rural desert community, not an urban entertainment district. Using urban or suburban assumptions to minimize event traffic impacts in this setting is not credible. The project would intensify nighttime arrivals and departures on rural roads with limited infrastructure, and the County should not pretend those conditions are comparable to ordinary commercial development elsewhere.

7. Dust, nuisance, and degraded residential livability are being minimized.
The project description states that the parking and drive aisles will remain compacted native soil, and that if fugitive dust is observed, the applicant may apply gravel, water, or other measures. That is a reactive approach for a project of this intensity in a desert environment. Dust from unpaved parking, vehicle circulation, and overflow conditions is not a minor concern in a rural residential community. It affects visibility, air quality, cleanliness, and general quality of life.

8. The County cannot lawfully rely on a piecemeal or selective analysis to support a Mitigated Negative Declaration.
The Initial Study itself states that all answers must take account of the **whole action involved**, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and operational as well as construction impacts. It also states that where there is substantial evidence a project may have a significant effect, an EIR is required. Those standards are important here. A record that omits meaningful analysis of homes to the north and west, relies on questionable noise assumptions, contains an obvious parking discrepancy, and minimizes the realities of late-night event operations in a rural residential setting does not support a Mitigated Negative Declaration. It supports preparation of an **Environmental Impact Report**.

9. The project is fundamentally incompatible with Pioneertown as a small rural residential desert community.
The County's repeated reliance on the project's western styling and historical appearance misses the real issue. Architectural character is not the same as land-use compatibility. A western façade does not make a **500-person**, **2:00 a.m.** event venue compatible with nearby homes, dark skies, rural roads, parking constraints, noise-sensitive uses, and the peace and quiet expected in an unincorporated desert community.

In summary, the technical record does not convincingly demonstrate that County noise standards were properly applied to the correct receptors using complete and

reliable data. The record instead suggests a limited and possibly distorted baseline, inadequate nighttime analysis, incomplete receptor selection, unsupported assumptions about parking and operations, and a broader effort to downplay the true intensity of the proposed use. The County should not rely on this record as substantial evidence of compatibility or compliance.

For these reasons, I respectfully request that the County:

1. **Reject the current Initial Study / Mitigated Negative Declaration as inadequate;**
2. **Require a full Environmental Impact Report;**
3. **Require a revised and far more rigorous noise analysis;**
4. **Require complete receptor mapping and parcel-by-parcel land use verification;**
5. **Require nighttime baseline measurements on multiple dates;**
6. **Require property-line analysis at the nearest occupied residences, including homes to the north and west;**
7. **Require realistic operational assumptions addressing event frequency, hours, occupancy, speaker orientation, door management, crowd dispersal, traffic peaks, parking overflow, roadside impacts, and security practices;**
8. **Require full review of light pollution, dust, traffic, road access, and overall land-use incompatibility with the surrounding residential community.**

Pioneertown is not an entertainment district. It is a small rural desert community. This project is too intense, too under-analyzed, and too incompatible with the setting to be approved on the present record.

Thank you for your consideration and for including this comment in the administrative record for **PROJ-2022-00191**.

Respectfully submitted,

Curt Sautter

PO Box 425
Pioneertown, CA 92268

3/12/2026

From: Curt Sautter - Pioneertownsun.com
To: Rodriguez, Luis
Subject: Public Comment Opposing Approval of the Pioneertown Soundstage Project – PROJ-2022-00191
Date: Friday, March 13, 2026 6:59:02 PM
Attachments: Public Comment Opposing Approval of the Pioneertown Soundstage Project – PROJ-2022-00191-1.pdf

You don't often get email from webmaster@pioneertownsun.com. Learn why this is important

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Public Comment Opposing Approval of the Pioneertown Soundstage Project – PROJ-2022-00191

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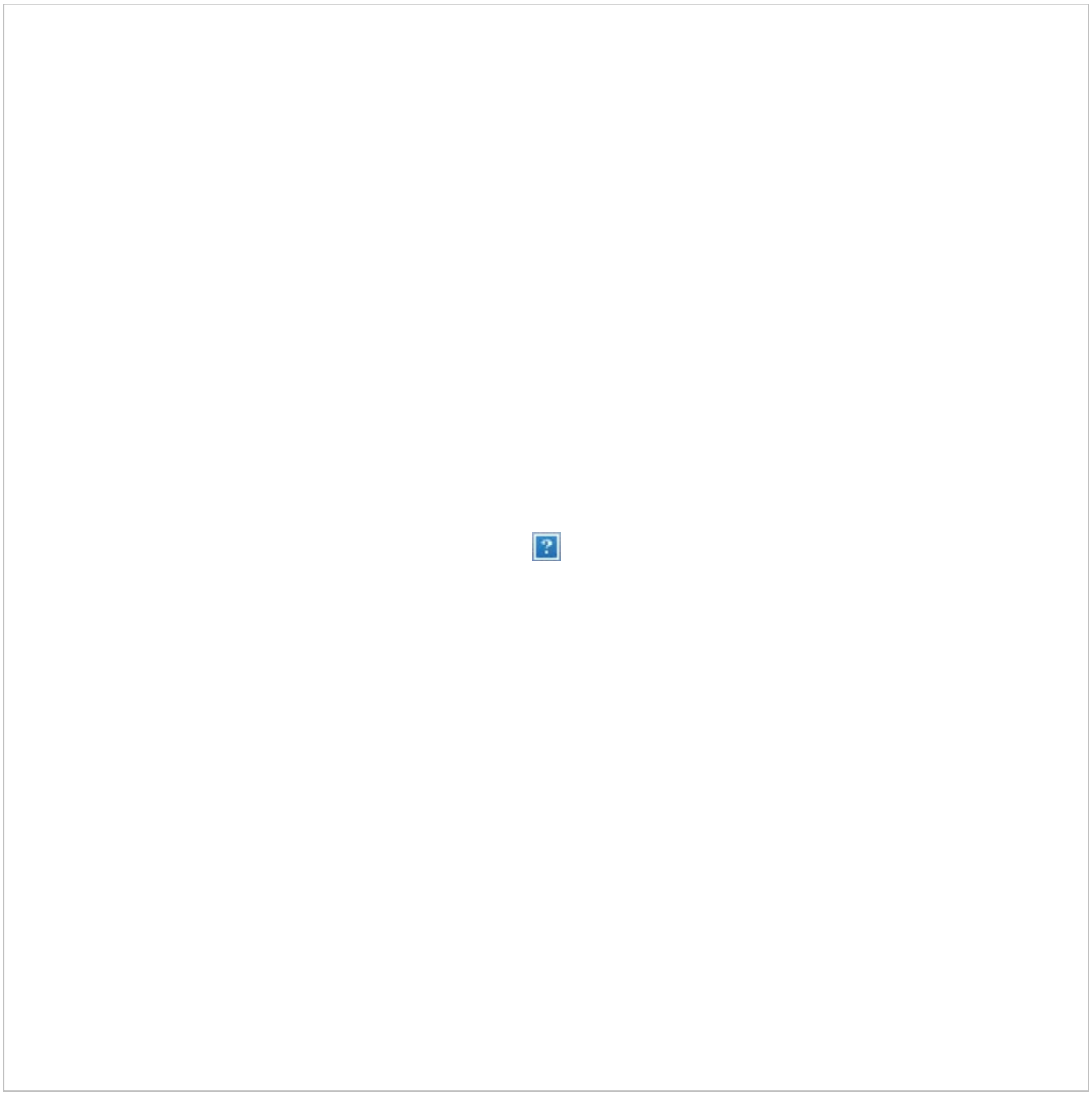
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5. The parking assumptions are internally inconsistent and unrealistic for event operations.
The Initial Study states that the project would provide **55 automobile parking spaces**, including **5 ADA spaces**, plus **1 loading space**. But the site plan's parking calculation states that **70 spaces are required**. The same site plan shows a **total of 55 spaces** while separately stating the total required is 70. That is a glaring discrepancy in the project's own materials.

This matters because the parking and traffic noise assumptions appear artificially flattened and detached from how event venues actually function. Event venues do not generate one neat, low hourly average of parking activity. They generate concentrated peaks before and after performances. Engines start at once. Car doors slam. People gather, linger, and talk. Headlights sweep across neighboring properties. Overflow parking spills into adjacent areas and along rural roads. In a quiet desert community, those impacts can be among the most intrusive of all. A project with a documented parking shortfall should not be approved based on optimistic assumptions that ignore real-world event conditions.

6. Rural traffic and road access conditions are not suitable for a high-intensity venue.
The project would rely on **two new driveways** on Pioneertown Road, one entry-only and one exit-only. The site plan and project description also state that most of the parking and drive aisles would remain **unpaved compacted native soil**, with only limited paved ADA parking. The transportation section of the Initial Study acknowledges there are no paved sidewalks along the adjoining roadway network in the area. That is not appropriate infrastructure for a high-intensity entertainment venue operating late into the night.

Pioneertown is a rural desert community, not an urban entertainment district. Using urban or suburban assumptions to minimize event traffic impacts in this setting is not credible. The project would intensify nighttime arrivals and departures on rural roads with limited infrastructure, and the

County should not pretend those conditions are comparable to ordinary commercial development elsewhere.

7. Dust, nuisance, and degraded residential livability are being minimized.
The project description states that the parking and drive aisles will remain compacted native soil, and that if fugitive dust is observed, the applicant may apply gravel, water, or other measures. That is a reactive approach for a project of this intensity in a desert environment. Dust from unpaved parking, vehicle circulation, and overflow conditions is not a minor concern in a rural residential community. It affects visibility, air quality, cleanliness, and general quality of life.

8. The County cannot lawfully rely on a piecemeal or selective analysis to support a Mitigated Negative Declaration.
The Initial Study itself states that all answers must take account of the **whole action involved**, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and operational as well as construction impacts. It also states that where there is substantial evidence a project may have a significant effect, an EIR is required. Those standards are important here. A record that omits meaningful analysis of homes to the north and west, relies on questionable noise assumptions, contains an obvious parking discrepancy, and minimizes the realities of late-night event operations in a rural residential setting does not support a Mitigated Negative Declaration. It supports preparation of an **Environmental Impact Report**.

9. The project is fundamentally incompatible with Pioneertown as a small rural residential desert community.
The County's repeated reliance on the project's western styling and historical appearance misses the real issue. Architectural character is not the same as land-use compatibility. A western façade does not make a **500-person**, **2:00 a.m.** event venue compatible with nearby homes, dark skies, rural roads, parking constraints, noise-sensitive uses, and the peace and quiet expected in an unincorporated desert community.

In summary, the technical record does not convincingly demonstrate that County noise standards were properly applied to the correct receptors using complete and reliable data. The record instead suggests a limited and possibly distorted baseline, inadequate nighttime analysis, incomplete receptor selection, unsupported assumptions about parking and operations, and a broader effort to downplay the true intensity of the proposed use. The County should not rely on this record as substantial evidence of

compatibility or compliance.

For these reasons, I respectfully request that the County:

1. **Reject the current Initial Study / Mitigated Negative Declaration as inadequate;**
2. **Require a full Environmental Impact Report;**
3. **Require a revised and far more rigorous noise analysis;**
4. **Require complete receptor mapping and parcel-by-parcel land use verification;**
5. **Require nighttime baseline measurements on multiple dates;**
6. **Require property-line analysis at the nearest occupied residences, including homes to the north and west;**
7. **Require realistic operational assumptions addressing event frequency, hours, occupancy, speaker orientation, door management, crowd dispersal, traffic peaks, parking overflow, roadside impacts, and security practices;**
8. **Require full review of light pollution, dust, traffic, road access, and overall land-use incompatibility with the surrounding residential community.**

Pioneertown is not an entertainment district. It is a small rural desert community. This project is too intense, too under-analyzed, and too incompatible with the setting to be approved on the present record.

Thank you for your consideration and for including this comment in the administrative record for **PROJ-2022-00191**.

Respectfully submitted,

Curt Sautter

PO Box 425
Pioneertown, CA 92268

3/12/2026

From:	Ben Loescher
To:	Rodriguez, Luis
Subject:	RE: Pioneertown Sound Stage Initial Study
Date:	Sunday, March 15, 2026 8:42:15 PM
Attachments:	Exhibit 3 - 230809 Project Application Narrative.pdf Exhibit 4 - P201900197 Pioneertown Historic Research.pdf Exhibit 0 - Site Context.pdf 260314 Sound Stage Initial Study Comments.pdf Exhibit 1 - 2308XX A Plan to Save Pioneertown.pdf Exhibit 2 - 210331 Preapplication.pdf

You don't often get email from k.ben.loescher@gmail.com. Learn why this is important

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

(Hi Luis, I duplicated one of the attachments in the previous email - please use this letter instead)

Hello Luis,

Thank you for the opportunity to comment on the Initial Study and supporting documents for the Pioneertown Sound Stage project. I've included those comments and some reference materials below. I would like to see some version of this project approved but as represented here it needs a lot of work to meet County and State standards. I happy to answer any questions or talk through these with the applicant if that would be helpful. Note that I am building my home immediately adjacent to this proposed project (permits issued!) so I am very invested in helping ensure the applicant successfully delivers a high quality project compatible with the historic district and community.

Best,

K. Ben Loescher
5615 Red Ryder Road
Pioneertown, CA 92268

From: nancyolsen@deliriumrecords.com
To: Rodriguez, Luis
Subject: Public Comment on PROJ-2022-00191 – Pioneertown Soundstage
Date: Sunday, March 15, 2026 10:51:01 PM

[You don't often get email from nancyolsen@deliriumrecords.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

To San Bernardino County Planning Staff and Decision Makers:

My name is Nancy Olsen, and my retirement homeI is near the proposed Pioneertown Soundstage project. I am submitting this comment in strong opposition to the project as currently described and analyzed. From the perspective of someone who moved here because of the peaceful environment and quiet nights, this project is not a good fit for a small desert residential community like Pioneertown.

This is not an urban commercial district. This is a rural residential community of roughly 3,000 people, with limited infrastructure, limited law enforcement presence, limited fire and emergency response, and long response times. When problems happen here, help is not around the corner. That reality should be central to this analysis, but it is not.

One of the most troubling issues is that the project documents are inconsistent about the site's zoning and surrounding land uses. The Notice of Intent describes the project as being on 1.84 acres in the Special Development-Residential (SD-RES) zoning district. But other project materials describe the site as commercial, Rural Commercial, SD-RES, and even General Commercial on the same site plan. As a nearby resident, I also object to the way the studies characterize surrounding properties as "commercial." None of the properties identified as commercial are actually commercial. They are Special Development Residential, and the properties outside of Mane Street are residential as well. That matters because the project is being analyzed as if it is surrounded by commercial uses, when in reality it is in and around homes.

The noise analysis is especially concerning. The study says the project is surrounded by commercial uses to the north, west, and east, with only vacant residentially zoned land to the south. It then relies on a single one-hour noise measurement taken from 3:05 p.m. to 4:05 p.m. at the patio to establish baseline conditions. That does not reflect the actual experience of nearby residents during nighttime operations, event activity, crowd noise, parking movements, and people leaving the site late at night. The same report models the soundstage with the doors open and recognizes different residential and commercial noise limits, yet its conclusions depend heavily on how neighboring properties are classified. If the surrounding properties are residential, then the study understates the project's true impact on the people who live here.

The traffic analysis also fails to address the real-world conditions of

this community. The report is only a transportation screening assessment, not a full traffic impact study. It expressly excludes the continued existing use of the Soundstage from the traffic analysis, even though that use is central to the project and its impacts. It also admits that the trip-generation data come from general urban and suburban settings, not rural communities like Pioneertown. Even so, the report still forecasts approximately 380 daily trips, with the Soundstage operating until 2:00 a.m. Friday through Sunday. For a remote desert community with narrow roads, limited shoulders, and homes nearby, that is not a minor issue.

Parking is another obvious problem. The site plan shows 55 spaces provided, while 70 are required. A 15-space parking shortfall in a rural area does not just disappear on paper. It means overflow parking on nearby roads, congestion, blocked access, dust, noise, trespassing, and spillover impacts into surrounding residential areas. Residents will bear those impacts, not the consultants.

The County's own summary form acknowledges that this project has potentially significant effects in multiple categories, including air quality, aesthetics, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, noise, transportation, utilities, and mandatory findings of significance. It also acknowledges that local residents and business owners have already raised concerns regarding noise, light pollution, wildlife, water usage, trash, parking, traffic, historic preservation, and fire prevention control. Those are not abstract concerns. They reflect the real conditions of daily life in Pioneertown.

This project is also located within the Pioneertown Mane Street Historic District, and the Soundstage and Gazette are identified as contributing historic resources. The cultural report confirms that the project includes ADA parking and ramps, shade structures, modular restrooms and kitchen units, landscaping, gravel parking and access, a septic system, lighting, and other site changes. Whether or not some of those elements can be designed sensitively, this is still a substantial intensification of activity in a historic rural setting that was never meant to function like a late-night event district.

As a nearby resident, I am also concerned about the impacts the studies do not meaningfully address: people wandering through the area before and after events, noise carrying across the desert at night, headlights and lighting, trespassing near homes, lack of adequate security, wildfire risk, evacuation constraints, and the burden on limited sheriff, fire, and medical response resources. In a rural unincorporated area, those issues matter more, not less.

For all of these reasons, I urge the County not to approve this project based on the current record. At a minimum, the County should require the applicant to correct the land use and zoning assumptions, analyze the project based on the actual surrounding residential properties, prepare a true rural traffic and parking study, and fully address public safety, emergency access, fire protection, and compatibility with a small desert residential community.

As currently presented, this project is not adequately analyzed, and it is not appropriate for this location.

Respectfully submitted,

Nancy Olsen

Nearby Resident, Pioneertown

DANIEL D. PAUL, ARCHITECTURAL HISTORIAN

3938 VISTA COURT GLENDALE- LA CRESCENTA, CA 91214

DBA CULTURAL CHAPTER
WWW.CULTURALCHAPTER.NET

March 16, 2026

Mr. Luis Rodriguez, Contract Planner
County of San Bernardino
via email: luis.rodriguez@lus.sbcounty.gov

SUBJECT: Pioneertown Soundstage and Pioneertown Gazette: recent and proposed work by the Pioneertown Land & Management Co.

Dear Mr. Rodriguez,

My name is Daniel Paul. I am a 36 CFR Part 61 federally qualified architectural historian, and author of the 2019 National Register of Historic Places (NRHP) Pioneertown Mane Street Historic District application, successfully listed the following year. Since 2023, I have been aware of a proposed project at the Pioneertown Soundstage; I have attached my January 2024 comment letter. Insofar as the project appears to be the same, my comments in that letter hold.

I have viewed the recently completed the 2024 BCR Consulting Cultural Resources Assessment, the 2025 CRM Tech Historic Building Study, and the Tom Dodson & Associates 2026 CEQA Initial Study (IS). I'm curious to know what materials BCR, CRM and Dodson reviewed to make their conclusions. Aside from some general views included in a 2023 applicant PowerPoint, I am not aware of any finished architectural renderings, massing studies, elevational drawings, or materials studies. Such studies are necessary to understand what the project will truly be, and how it will exist in a historically significant pedestrian corridor, perhaps for decades to come. None of the studies include them, or otherwise indicate these necessary items are missing or forthcoming. Though I commend all three reports on acknowledging the need for any project to follow the Secretary of the Interior's Standards for Rehabilitation, I'm not clear how these studies can conclude the project presents no impacts when these necessary materials for analysis do not seem to exist. Because these materials do not seem to exist, the applicant's submittal is presently incomplete, and I would ask that the County receive these materials from the applicant before any approvals, including those around potential mitigation measures, are made.

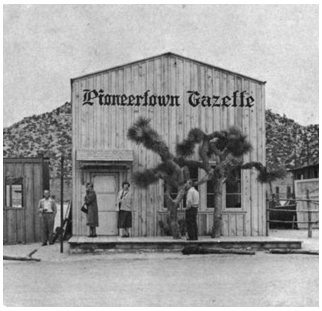
Regarding mitigation, it is concerning that the BCR technical report, twice in a multi-paragraph cut-and-paste manner, proposed HABS/ HAER-type mitigation, specifically HABS *style* photographic mitigation, for a project that today cannot be properly analyzed. Often used to document demolition of historical resources, HABS *style* photographic mitigation is among the most superficial mitigation measures that exist. Here I am especially concerned for a scenario where the

applicant will later present the details of their proposed work, the details will be unacceptable, but the lead agency will use "HABS *style* photographic documentation" as a reason to approve the project anyway. The project ***must*** follow the Secretary of the Interior's Standards for Rehabilitation, and there is no way to conclude the project does so today with the materials presently available.

What we do know of this applicant is that they have already undertaken unpermitted work and activities at the project site. It is fantastic that the applicant preserved the earlier-era *Pioneertown Gazette* signage. But upon this property the applicant has not only already undertook unpermitted work, but unpermitted work already violating the Secretary of the Interior's Standards for Rehabilitation in a variety of ways. Among them, the applicant killed and removed a living Joshua tree located in front of the building, clearly present during the period of significance, and demolished the *Pioneertown Gazette* building's wood boardwalk:



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4

Photos 1 and 2: Pioneertown Sun, https://pioneertownsun.com/early-photo-gallery/, accessed March 15, 2026.
Photo 3: Daniel Paul, 2019
Photo 4. CRM Tech, June 11, 2025

Aside from the issue of if any Joshua Trees should be purposely destroyed at this time, my NRHP nomination for Mane Street identified both the Joshua Tree specimens and the wood boardwalk as character defining features of the Mane Street historic district. As a condition of any potential project approval, I would please urge that the County mandate the return of both elements, and consider this applicant's prior actions when contemplating the advance approval of any mitigation for their as-now incomplete project submittal.

If the applicant's August 2023 PowerPoint is any indication, and this appears to be the closest the public has to any sort of project renderings, I'm quite concerned not just for the inappropriateness of the design, but the amount of clutter, better suited to the back of the property away from Mane Street, this project will introduce to the Mane Street pedestrian viewshed. Just as Mane Street is double-width for the function, to afford flexibility to a wide range of filming activities, during its period of significance Mane Street was purposely open and uncluttered.

Reviewing again after two years the applicant's August 2023 presentation materials, I'm reminded of the peculiar tone of their proposal. Thriving new businesses are encouraged. But Pioneertown does not need saving, Pioneertown does not need this applicant, and does not need this applicant to save Pioneertown. Before any decisions are made, including choices to support the findings of the above- mentioned technical reports and IS, may the County first review the details of architectural design-work necessary to make any conclusions, that today are nowhere to be found. That design details are done right, authentic and intact to the historic district is what attracts the thousands to immersive, character-filled environments like Mane Street. Anything else is destruction.

Thank You,



Daniel D. Paul

Attachment: January 15, 2024 project comment letter.

DANIEL D. PAUL, ARCHITECTURAL HISTORIAN
3938 VISTA COURT GLENDALE- LA CRESCENTA, CA 91214

January 15, 2024

Jim Morrissey, Contract Planner
San Bernardino County Planning Department
Via email: Jim.Morrissey@lus.sbcounty.gov

SUBJECT: Project Number PROJ-2022-00191, APN 0594-391-06, 07, and 08

Dear Mr. Morrissey,

My name is Daniel Paul. I am a 36 CFR Part 61 federally qualified architectural historian with 30 years' experience in the historic preservation field and over 15 years' experience with built environment regulatory setting and environmental compliance. My experience includes a multitude of applications of the California Environmental Quality Act (CEQA), the Secretary of the Interior's Standards for Rehabilitation, and the authorship of multiple successfully listed National Register of Historic Places applications. I am a historic preservation commissioner for the City of Glendale, CA, and in that capacity have undertaken many design reviews where I'm called to apply the Secretary of the Interior's Standards for Rehabilitation relative to historically designated properties. In 2018, Friends of Pioneertown hired me to author, prepare, and shepherd the Mane Street Historic District National Register of Historic Places landmark designation, which was formally listed by the Keeper of the National Register in 2020.

I am writing to express deep concerns regarding Project Number PROJ-2022-00191, and its potential impacts upon the Pioneertown Mane Street Historic District. Because Mane Street is a National Register of Historic Places-listed historic district, and the proposed project would be undertaken within the district's boundaries, in order to avoid a significant impact, the project must meet what CEQA entails for work undertaken in historic districts. Feasible design changes could substantially improve the proposed project, and I hope that the applicant will consider such adjustments. But as of today, the presently proposed project is incompatible to the historic district's surrounding character defining features, and fails to meet the Secretary of the Interior's Standards for Rehabilitation: guidelines accepted as a baseline approach for appropriate work in any variety of historic properties across the US, and specifically mentioned in CEQA Section 15064.5(b)(3). Because the proposed project is not in conformance with the Secretary of the Interior's Standards for Rehabilitation, the proposed work would materially impair the Pioneertown Mane Street Historic District, per CEQA section 15064.5(b)(2). Please see Appendix A for a link to CEQA Section 15064.5, which addresses impacts to historical resources.

The proposed project materials not only fail to follow the Secretary of the Interior's Standards, nor are the Standards referenced even one time in them, but the proposal in its tone has a hostility toward regulations which shows in the proposed project itself. This is unfortunate, as historic properties and the districts they are part of, if properly preserved, have demonstrably higher property values.

According to the author Donovan Rypkema, "Because of concerns of "property rights" and a widespread suspicion of regulation among property owners, the creation of local historic districts is not infrequently an issue of heated debate. Among the arguments used by opponents is "a local historic district will constitute another layer of regulation and more regulation, prima facie, will have an adverse effect on property values." Historic property owners may also resent being regulated more than their neighbors, when they may have already agreed through their stewardship to devote extra care for a historic resource. Because of this, the relationship between local historic districts and property values has been the most studied area of preservation economics in the United States."[1]

Over the last three decades, a multitude of studies have demonstrated that properly preserved properties within historic districts ascend in property value, even substantially more than comparable properties or districts not historically listed. In Appendix B, I have included a variety links to websites with studies, and compilations identifying this relatively consistent pattern. It is not so much historic listening alone that renders the property valuable, but the assumption that the property, and the consistency of character defining featured embodied in it, will be maintained and preserved.

The primary manner in which the National Park Service, not to mention CEQA under Section 15064.5(b)(3), implements this, is by applying the previously mentioned Secretary of the Interior's Standards for Rehabilitation: ten basic guidelines that if applied will preserve historic properties, thereby allowing them to continue conveying their historic significance. In order for a project to be a preservation success, the Standards must be properly addressed- with integrity and in good faith- by the applicant and his environmental consultant. I have included the Secretary of the Interiors Standards for Rehabilitation in Appendix C.

Designing within a historic district is an art that pays dividends if correctly done. The requests to make the project compatible to the Standards is feasible, and should not be economically burdensome; tens of thousands of people living and owning in historic districts across the US regularly undertake these measures. The requested expenditure is instead one of thought, sensitivity to detail, and historic research. Regarding the expenditure of research, the Mane Street National Register nomination has already taken care of this. Aside from following the

[1] Donavan Rypkema and Carol Cheong. Measuring Economic Impacts of Historic Preservation: A report to the Advisory Council of Historic Preservation by PlaceEconomics. Washington DC: PlaceEconomics, 2013: 21. https://www.achp.gov/sites/default/files/guidance/2018-06/Economic%20Impacts%20v5-FINAL.pdf. In California, whether a property is a local historic district, or National Register of Historic Places listed one, both instances are historical resources for the purposes of CEQA. Therefore, relative to California, Rypkema's reference to local districts also applies to NHRP districts through the CEQA nexus.

Secretary of the Interior's Standards- or rather- as a path to do so, I encourage both the applicant and the County to please be aware that the Mane Street National Register nomination includes detailed sets of character defining features for a variety of Mane Street's buildings, structures, objects, and landscape elements, and even lighting. Insofar as the State of Office of Historic Preservation, the State Historical Resources Commission, and ultimately the Keeper of the National Register in Washington DC all reviewed and approved this nomination, these features are perceived as having historic, cultural, social and aesthetic value for Pioneertown's Mane Street. Please see Appendix D for a list of identified Mane Street character defining features as listed in its National Register of Historic Places application.

The applicant states his intent to bring Pioneertown back to "its original intended purpose," which is commendable. That purpose, first and foremost, was a remarkably accurate 19th century-themed film set. Although no building permits are known to exist, it appears that Pioneertown was designed by architect Leslie Brandman, in-tandem with Hollywood set designer Fred Moninger. With its period of significance stretching from 1946 to 1966, Pioneertown was designed, first and foremost, as a film set to replicate a late 19th century Western ghost town. Aside from the double-width of Mane Street to accommodate filming vehicles, all other aspects of Mane Street's buildings, structures, and landscape elements adhered to Hollywood's high and detailed standards for set design, necessary to fully immerse television's early era audiences into the realm of another time and place: the late 19th century Wild West. When contemplating what may be right to build upon Mane Street, a simple question to pose is "would the proposed project look out of place in a movie about the Wild West?" Unfortunately, the answer to such a question for the proposed undertaking is yes. Despite the aged wood veneer cladding it so generously applies, the proposed project is hyper--contemporary and Modernist in spirit, with its unadorned abstract lines and container-like elements.

With the Secretary of the Interior's Standards in-mind, in addition to the character defining features elucidated in the nomination and attached in Appendix D, the following are suggestions that I hope may help better fit this proposed project into the Mane Street Historic District.

The **Pioneertown Gazette** building, which was already clad in a recent T1-11 at the time of the listing, retained integrity for listing because the building retained its form and massing. The Pioneertown Mane Street Historic District was found NRHP eligible under Criterion A: a significance based upon social history versus high architectural design (NRHP "Criterion C") that afforded this flexibility in terms of historic integrity. However, contrary to what some environmental consultants may argue, based on a property's area of significance, architectural design elements, vernacular or otherwise, are relevant character defining features under Criterion A. For Mane Street they necessarily inform the property's eligibility and historic integrity as a 19th century- themed Western film set. The presence and maintenance of character defining features matter for *any* NRHP eligibility criteria.

The Pioneertown Gazette building was found to retain historic integrity despite, not because of, its T1-11 cladding. To now propose cladding that reads as similarly new and flat as the older T1-11 exacerbates the circumstance. The documentation is clear and available to show that the Gazette looked substantially different during the period of significance than what the present project proposes for the building's foreseeable future upon Mane Street (Please see Figure 2 below, and Appendix E). Though a fair case can made that it may be even better to simply leave the building alone than reclad it in an even newer and extremely wrong flatness, it is encouraged that the County instead include a condition that the applicant restore the Pioneertown Gazette in a manner following the Secretary of the Interior's Standards for Rehabilitation. Repaired, returned, or otherwise restored elements would include the building's treated wood board and batten, and tongue-and- groove cladding systems, fenestration patterns at front and side elevations, pent-roofed hood supported by wood brackets, simple and standalone untreated wood porch pad with integrated Joshua Tree, wood frame multi-light windows, two-part wood fasciae, and other applicable features as seen in historic-era imagery of the Pioneertown Gazette (please see figure 2, and Appendix E). The likelihood is high that the original board and batten, and wood tongue and groove cladding at side elevations is still present beneath the present T1-11 cladding. Even if it is not, this condition is still requested. Many of these adjustments are cosmetic, and should not be economically burdensome. Admirably, the applicant has expressed a desire for "delicately restoring existing Pioneertown/ Mane Street buildings," and per CEQA, not to mention professionally accepted preservation practice, following the Secretary of the Interior's Standards is the means to do so.



1.



2.

1. Proposed renovations to Pioneertown Gazette building
2. Pioneertown Gazette: historic-era imagery

Please see **Appendix E** for additional historic-era pictures of the Pioneertown Gazette building

The “Hitching Post” outdoor dining **shade structure** canopy as proposed is too standardized and generic of a design for the Mane Street Historic District. If the canopy will be made of wood, it will be encouraged to follow wood treatments for aging, posts and other applicable wood elements as mentioned in Appendix D. To differentiate from pre-existing, historic-era buildings and structures, a substantial set back from Mane Street’s frontage, moving the structure back and away from sightlines, is also encouraged.

It might be noted that in Wild West 19th century towns, outdoor dining commonly took place beneath simple but large canvas tents, not unlike the canvas seen at covered wagons, supported by simple, untreated wood poles or posts. A raw untreated canvas in addition to untreated natural wood elements would be encouraged in place of the presently proposed shade structure. The former is easily demountable, reversable, and even movable as needed. The natural color of the canvas and the untreated wood compliment contributing resources and elements within Pioneertown, not to mention the desert landscape, that itself was a primary character in Pioneertown’s multitude of films and television shows.

Within the shade structure is proposed an oversized **flue,** abstract and contemporary looking, therefore incompatible to the historic district. The applicant is encouraged to revisit the scale, abstraction and lack of detailing of this design element, including its glass cube. That the **firepit** beneath the hearth appears to be made of stone is encouraging, but unless properly handled, this feature too will be incorrectly done. The applicant would be encouraged to mirror the boulder work detailing- in kind, texture, placement, and composition, seen in the nearby watering trough: a contributing object to the Pioneertown Historic District. As presently proposed, the flue and firepit, not to mention the shade structure, are no different than what might be seen at any Western-themed chain restaurant, and are not appropriately specific in their details and design to Mane Street’s character defining features.

As presented in the imagery, the present designs for **hitching posts** and **boardwalks** are too finished, abstract, and contemporary in their detailing to be proper character defining features of 19th century Western town. Appendix D includes landscape character defining features, and may be a good starting point for how these small but highly visible and important details might be handled. As mentioned above relative to the Pioneertown Gazette, the porch pad in front of the Gazette was a standalone one of untreated wood plank, and it is encouraged to follow that design lead for the Gazette’s new porch.

Based off the proposed project, whether the **kitchen** and **restroom** structure will really be temporary is confusing, and one wonders if the applicant is playing a shell game with the County. Would both not be permanently needed relative to the proposed project? The flat and unadorned but “aged wood” this project proposes is superficial and insufficient everywhere, but is particularly glaring upon the sizable kitchen structure which looks like a shipping container- the project materials even refer to it as a “kitchen container.” Presently, the container trope is a commonplace hipsterized design element may be appropriate, and even welcome, in any variety of other San Bernardino County locales, but does not meet the Secretary of the Interior’s Standards for Rehabilitation for this district. Despite their wheels, if

these new elements will be present over any steady span, for them to meet the Standards, a substantial redesign will be necessary with a much more acute sensitivity to architectural detailing. If trailers of some kind are proposed, please consider any variety of design cues taken from many popular trailers- popular and collectible even now- that existed during the property's period of significance: 1946-1966.

The County of San Bernardino does not have an abundance of historic districts that are not municipally listed. The County of San Bernardino has very few Mane Streets: a non-municipal historic district of popularity and cachet transcending well beyond County boundaries. For the County, a good Mane Street parallel might be Calico, which is listed as California Historical Landmark #782, and therefore a CEQA historical resource. A true ghost town with work undertaken upon it by Walter Knott in the 1940s, Calico is remarkably intact; its main street core separate from secondary infrastructure such as parking areas, a check-in kiosk, and additional restrooms. Possessing no buildings or structures latently aspiring to be contemporary, recent structures and buildings within Calico's core do a remarkable job of design integration. County Parks has preserved its filmic, 19th century Wild West theming with remarkable consistency, and that total immersion is part of its draw. Contributing resources in listed historic districts, already recognized for standing the test of time with distinction and significance, are inoculated against its further passage in ways that contemporary buildings within them are not. Past preservation properly done today is the best future investment.

My research of Pioneertown's Mane Street did not conclude at the end of its 1966 period of significance, but continued up to 2019, when I finished and submitted the nomination document to the California Office of Historic Preservation (OHP). As such, I can speak to when Pioneertown has waxed and waned in terms of being a filming location, its population, and its popularity in general. Pandemic aside, which adversely affected businesses across Mane Street, San Bernardino County, and for that matter- the world, the popularity of Mane Street as a tourist destination has been ascendant since the early 1990s. Just as Mane Street has received positive national and international press, which it has for the last few decades as a boutique destination, in equal measure Mane Street regularly draws tourists from across the US, and from far beyond it.

With this in mind, the project proposal's cynical and dystopian tenor are unreal positions relative to how widely known, visited and beloved Pioneertown is today, and was, long before this applicant ever arrived. Certainly, Sir Paul McCartney would have never steeped foot here to play if the situation was as grim as this applicant states! Especially coming from an applicant who owns multiple properties within it, it is laughable to call Mane Street a "dying piece of history," that is "not being looked after" and will "continue to degrade" or to state that Mane Street will become "dust in the wind" if he is not allowed to build concert venue, ice cream store, and outdoor seating area. These gaslit threats are hostile, and feel like bullying tactics. This project as proposed is not necessary to "Save Pioneertown," which this project would be far from achieving, even if Pioneertown needed saving, which it does not.

With that said, I am not writing in hopes of seeing the project cancelled. The applicant proposes some uses and services that are positive. But work undertaken within districts should not read as borne from trends of the fleeting now, bound to age quickly and poorly in otherwise historic settings. I firmly believe that project modifications that meet the Secretary of the Interior's Standards will present future benefits- perhaps even unexpected- for the applicant, Mane Street, and the County of San Bernardino. I hope that my input might prove both constructive and helpful to all parties involved.

Thank You,



Daniel D. Paul, Architectural Historian
daniel@culturalchapter.net
(213) 215-4161
www.culturalchapter.net

Attachments:

Appendix A: Link to CEQA Section 15064.5
Appendix B: Preservation and Economy
Appendix C: Secretary of the Interior's Standards for Rehabilitation
Appendix D: Character Defining Features from the Pioneertown Mane Street NRHP Application
Appendix E: Four Historic-Era Pictures of the Pioneertown Gazette

APPENDIX A: Link to CEQA Section 15064.5 ("Determining the Significance of Impacts to Archaeological and Historical Resources")

https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-5-preliminary-review-of-projects-and-conduct-of-initial-study/section-150645-determining-the-significance-of-impacts-to-archaeological-and-historical-resources

APPENDIX B: PRESERVATION AND ECONOMY

Selected Studies Regarding Preservation and Economy by PlaceEconomics:

A full of collection of PlaceEconomics studies can be found here:
https://www.placeeconomics.com/resource/

Twenty-Four Reasons Historic Preservation is Good For Your Community," 2020:
https://www.placeeconomics.com/wp-content/uploads/2020/01/City-Studies-WP-Online-Doc.pdf

"Measuring Economics of Historic Preservation," 2013:
https://www.achp.gov/sites/default/files/guidance/2018-06/Economic%20Impacts%20v5-FINAL.pdf

"Main Street Alabama," 2023. (A study of preservation in Commercial Districts and Main Street contexts): https://www.placeeconomics.com/resources/main-street-alabama-alabamas-billion-dollar-success-story/

The Economic Effect of National Register Listing," 1994:
https://www.placeeconomics.com/wp-content/uploads/2016/08/placeeconomicspub1994.pdf

Compilation of recent preservation studies and their economic findings (Non PlaceEconomics)

Richard Schmidt, "Extracts From The Literature On The Effects Of Historic Preservation On Property Values," 2016:

https://static1.squarespace.com/static/543940e3e4b03c56171e6ce6/t/58f8b3e1d1758e3d9afd652e/1492693987077/2016.11-HD-Effects-of-Historic-Preservation-on-Property-Values.pdf

APPENDIX C: Secretary of the Interior's Standards for Rehabilitation

Available: https://www.nps.gov/subjects/taxincentives/secretarys-standards-rehabilitation.htm

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

APPENDIX D: Character Defining Features from the Pioneertown Mane Street National Register of Historic Places Application

Full nomination available here:
https://drive.google.com/file/d/15dnMLyuKOgH5CACkJ98L6afApYXLq7Bw/view

ELEVATIONAL CLADDING:

May be variegated upon given structure: front cladding may vary from side and/or rear cladding. Is generally simple, unornamented and consistent across a given elevation; wood cladding at gable ends varied from other cladding at same elevation.

Wood: purposely aged and stained; board and batten; simple board; or shiplap (upon houses); aged wood railroad tie cladding at select elevations, set in mortar, extended tailing at building corners.

Adobe: Adobe brick cladding with Portland cement or earthen mortar

Stucco: Limited stucco work at public elevations but where present- either hand troweled, textured, or implying adobe-like blockwork. Smooth stucco work, though it already exists on limited structures, is not encouraged at front elevations, but is present upon the side elevations of certain earlier buildings.

Corrugated metal is present at certain side and rear elevations, not front elevations.

OTHER ELEVATIONAL DETAILS:

Wood surrounds at doors and windows, often with tailing (stub-end or switchback) at lintels, rails, or transoms; continuous wood frieze boards, wood fasciae- aged or painted.

Extended inset wood lintels above doors and windows.

Periodic inset vertical wood members of board, post or split log that run full height at front elevation, dividing it into bays.

Concrete slab foundations (hidden).

Utility pole ridge beams (Pony Express Station/ Pappy & Harriett's only).

PORCH, DECK, RAILING:

Porches of partial, full-width, or quarter-turn varieties; flat, pent-roofed, or extended shed porch roofs; porches supported by aged wood posts with block or keystone capitals, or knee bracket at capital; metal pipe columns support some porches; ornamental detailing such as turned spindle bracketing, matchstick balustrades along porch roof or at deck railing; extended wood lintels beneath porch roofs; Stained, or aged wood board decks at entry, or stained concrete decks, accessed by steps of similar material. Raised wood decks often obscure concrete foundations of buildings, which in most instances are hidden.

Appendix D, ctd.

DOORS:

Wood doors, some purposely aged: of blank panel, cross-bucked, multi-paneled (three, six or eight panel), split service doors; view glass at some upper panels; wood frame screen doors. Centered double barn doors of aged or rusticated wood board with cross planking.

WINDOWS:

Wood frame single light fixed or double hung multi-light of varying dimensions, paired or standalone; wood sills; large multi-light 1940s-era wood frame windows set narrow wood surrounds with small wood sills; narrow and vertically acclimated multi-light windows.

Vinyl windows of any kind are discouraged except at rear elevations not visible from public right of way.

ROOF:

Type: Shed, monitor, or front gable.

Wood Rafter tails and extended wood beams beneath rooflines; wood fasciae.

Metal pipe chimneys.

Roofing material: Roofs are not readily visible upon many of the structures due to parapets; wood shingle roofs; galvanized or tin corrugated metal (often upon lean-tos or porches); generic and recent rolled asphalt or other fireproof material of compatible color to building if visible from public right of way; bright white roofing discouraged.

SECONDARY STRUCTURES AND COMPONENTS:

Pent-roofed lean-tos at side or rear elevations.

Building additions: separate or attached one-story, often behind primary building away from public right of way; often of variegated cladding, massing, and/or roof type from primary building.

SIGNAGE:

Wood blade signs at front elevation, perpendicular to it.
Hand painted signage in western styled serif font.
Simple mid-century era pole signs with metal or backlit plastic sign boxes, and basic graphics (off Pioneertown Road, not within Mane Street).
Neon signage historically present.
Rusticated wood signage with hand-painted western lettering, often in white.

Appendix D, ctd.

THREE PREDOMINANT BUILDING SUBTYPES:

Barn subtype: preponderance of: monitor roofs, loft doors (implied or actual) topped by extended beam for hay hook at upper levels, flanking bays at either side elevation, gooseneck lights, centered and double barn doors of vertical wood members and diagonal crossmembers.
Cabin subtype: preponderance of: rusticated wood train ties set in mortar, split log work, corrugated metal roofed porches supported by wood posts with continuous lintels.
False front western commercial subtype: preponderance of: shed or gabled roofs with gable end facing Mane street but baffled by parapet; parapets of flat, arched, stepped, or triangular variations; parapets are flat front or wrap around (boxed); off-center entries with transom windows.

LANDSCAPE ELEMENTS

Fences: Post and rail or board fences of simple but varying designs of stained, aged, or rusticated wood; wood picket fences; wood pole fences with metal pipe column railing; variegated fencing upon a given property.

Utility pole gateways at property entries, or lined upon the ground as barriers and edging.

Irregular course boulder landscape elements, including as planters.

Metal halide, high pressure sodium or high color temperature above 3500K are discouraged.

Periodic open lots between extant buildings that were vacant from the beginning.

Horse themed elements such hitching posts of metal pipe column, wood post or pole; original watering trough; and corral.

Adobe brick walls and fences.

Western themed objects (most appear to have been relocated) such as faux tank houses, barrels, wagons, windmills, and carts.

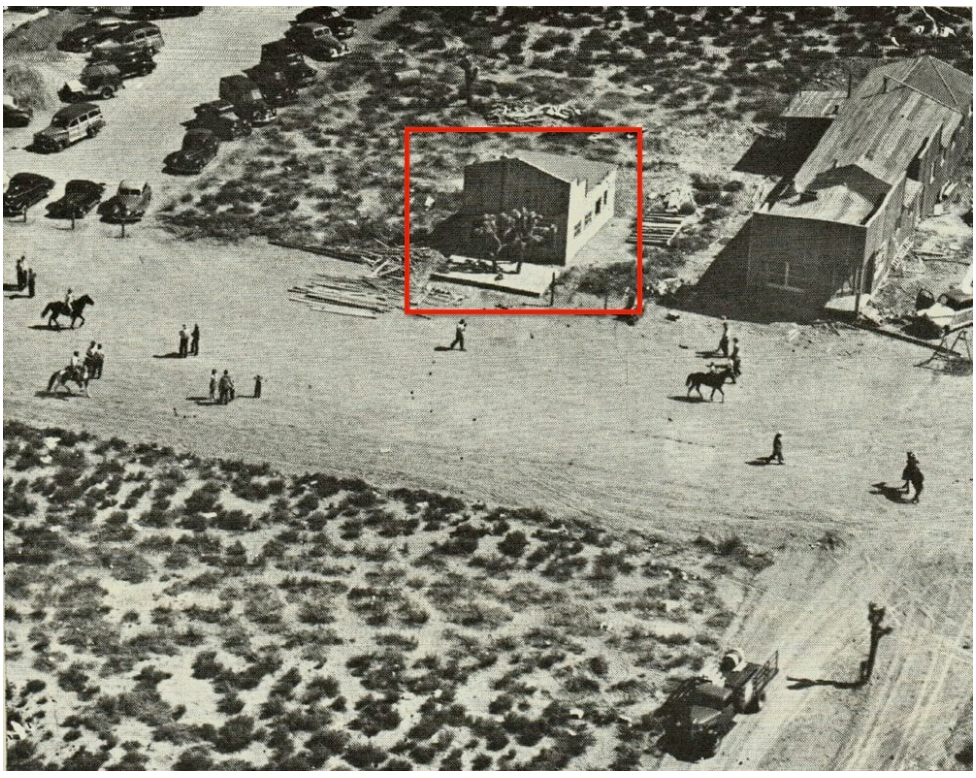
Mature Joshua trees, cottonwood trees, opuntia cactus succulent specimens and other native specimens.

Vehicular parking lots, present since Pioneertown's inception, are earthen (dirt) covered and unpaved, and located behind buildings and structure facing or adjacent to Mane Street.

Appendix E: Four Historic-Era Pictures of the Pioneertown Gazette

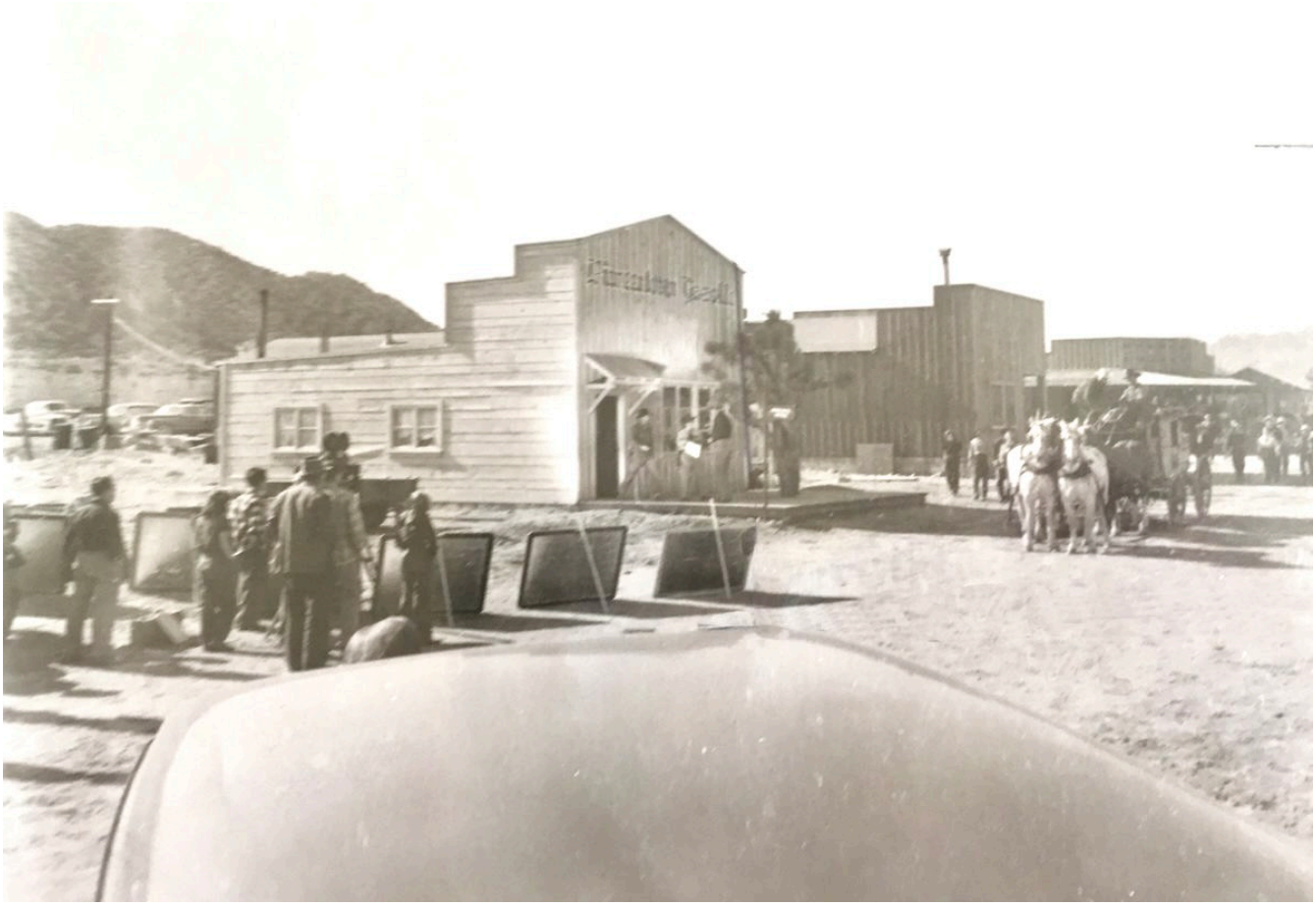
Courtesy: Curtis Sautter, Pioneertownsun.com





Appendix E, ctd.





MBCA

morongo basin conservation association

Post Office Box 24

Joshua Tree CA 92252

www.mbconservation.org

March 16, 2026

Pioneertown Soundstage
PROJ-2022-00191

Luis Rodriguez
Contract Planner
The County of San Bernardino
Luis.Rodriguez@lus.sbcounty.gov

Dear Luis,

The Morongo Basin Conservation Association offers the following substantive comments on this proposed development:

The project description is as follows:

A Conditional Use Permit to renovate and operate event structure, coffee and ice cream shop, and construct an outdoor dining/gathering pavilion. The existing 6,223 sq. ft. event building will be renovated to facilitate musical programming for residents and visitors of Pioneertown. The existing 831 sq. ft. coffee and ice cream shop building will be remodeled to fit with the Mane Street historical western style architectural design. the new 3,024 sq. ft. outdoor dining/gathering pavilion would serve as a gathering place between the event structure and coffee & ice cream shop, with shade and seating for guests. The outdoor patio area will have non-fixed picnic tables; additional modular structures are proposed to serve as public restrooms, mobile snack cart, and a self-contained mobile kitchen (225 sf) on 1.84 acres in the Special Development-Residential (SD-RES) zoning district.

There is an ongoing proposal to adopt a Pioneertown Overlay district in which this project would be located. A workshop was held to gather public comments and concerns nearly 4 months ago. There has been no follow-up with any updates after the workshop. While this project cannot be evaluated against the requirements of the overlay yet to be established,

the concerns expressed by the community have not been sufficiently evaluated within the Initial Study. These include:

1. The Cumulative effects of the Soundstage development.
    1. With the recent approval of the Pioneertown Motel, the ongoing entertainment events at Pappy and Harriets, proposals for additional commercial development on Mane Street and the expanding popularity of Pioneertown as a tourist draw, this development must be evaluated for its contribution to the overall intensity of commercial use in the area. The community suffers from an extreme influx of traffic when concerts, weddings, or special events occur. The analyses for traffic, emergency services (Fire!), water supply, wastewater treatment, visual impacts, noise and light trespass require consideration for their cumulative impacts as-a-whole. Pioneertown is a small community with limited infrastructure, and this development would add considerably to the already intense commercial uses within this small residential community.
    The County Wide Plan (CWP) was predicated on there being little growth in this region primarily due to the lack of infrastructure. However, since the adoption of the CWP there has been an explosion of new construction and proposals for development proposed to capitalize on the world-renown popularity of the high desert. On this larger scale, the IS for this development illustrates a need, and provides an opportunity to plan for the effects of this growth for the entire Morongo Basin.
2. Housing Availability
    a. In keeping with the above, the Draft Initial Study (IS) does not recognize the lack of any housing needed to serve the employees at this development. There is little long-term rental housing available within Pioneertown, where a significant number of residences have been converted to Short Term Rentals. Workers will need to travel up to Pioneertown from communities that may have available housing. The Vehicle Miles Travelled (VMT) to access housing for workers warrants evaluation within the IS.
3. Number of occupants tabulated within the IS.
    a. The calculation of the number of occupants/attendees at this proposed commercial development must be based on building code required tabulations and the reality of anticipated use. The Soundstage itself and the outdoor pavilion (without fixed seating) should be tabulated as 1 occupant per 7 square feet. This tabulation *6,223 plus 3,024 = 9047 sf generates* ***1,292*** *occupants*. This number of occupants would nearly triple the number of

residents within Pioneertown, and this surge of growth is not yet reflected within the IS. In addition to the above, there is a 3,258 SF outdoor dining area which could further boost the number of visitors to this development.

4. Scenic Highway
    a. Pioneertown Road is a County designated Scenic Highway and the IS does not sufficiently address important fact. The appearance of this development must be in keeping with and not detract from the scenic designation. The size materials and location of any fencing have not been addressed. See also below re: parking.
5. Parking
    a. The proposal is for the development to provide '*musical programming for residents and visitors' while* the tabulation is based on Retail /Trade. The number of spaces would more appropriately be for a dance hall and be applied for the Soundstage, Pavilion and outdoor dining. A musical venue would generate significant parking demand that is not provided! Parking frequently expands to the road shoulder of Pioneertown Rd creating blight along this scenic highway. The intensification of commercial activity in Pioneertown requires that parking be controlled and considered in Pioneertown as a whole within the IS.
6. Emergency Services
    a. The influx of the many visitors generated by this development in and of itself requires consideration of public/emergency services. With the dispersed geography of the County, the capability of law enforcement and emergency first responders has yet to be realistically evaluated in the IS. The potential of having a temporary surge in personnel available could address some concerns.
7. Sound
    a. The rural residential community within the natural environment has a low ambient noise that has not been recognized and considered within the IS. Noise travels great distances, and while the decibel threshold level may appear to be low, in the quiet of the desert, and with the proposed hours of operation, the rural community would be subject to unwanted and inappropriate noise. The recent complaints and code enforcement actions to enforce noise levels within Pioneertown provides evidence of the need to be pro-active in establishing conditions for a development of this size and intensity.
8. Lighting

a. The rural residential community with its low ambient lighting must be further considered within the IS. The Soundstage building currently employs non-conforming lighting that is in violation of the Light Trespass ordinance. It employs unshielded string lighting with individual lamps exceeding 40 lumens and the total exceeding 4000 lumens. The stated intention of the applicant to comply with lighting regulations is at odds with the existing lighting.

9. Drainage and Erosion
    a. The current drainage on Mane Street remains uncontrolled with ongoing erosion of the center of the street making walking unsure and un-safe. The site plan indicates drainage that will be intensified by this development being directed towards main street. The off-site effects of this additional water must be considered within the IS.
10. Compatibility Aesthetics with Pioneertown
    a. The existing Soundstage structure to be upgraded will be required to comply with current building codes as a condition of this development. The eastern wall of the Soundstage is shown as being on the property line and within the required setback. A variance would be required to permit its placement there. Further, a building accomodating the intended uses located on the property line will require that a parapet be provided. The architectural appearance of the buildings on site must be maintained and appropriate for the Historic Designation of Pioneertown and this reality has not been considered within the IS. See above for the imperative to maintain the Historic Appearance of this important Cultural Resource.

Thank you for your consideration,



Steve Bardwell, President
Morongo Basin Conservation Association

From: Laura Ransdell
To: Rodriguez, Luis
Subject: Sound Stage Proposal #PROJ-2022-00191 Concerns
Date: Monday, April 13, 2026 7:51:09 AM

You don't often get email from lauraransdell@hotmail.com. Learn why this is important

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

Dear Mr. Rodriguez,

I live in Pioneertown at 5181 William S. Hart Rd. I am deeply concerned about how this project could profoundly impair the quality of my life as a resident of Pioneertown. My greatest concern is about the noise level. This project proposes to have a night club and dance cafe with very loud music and the doors of the Sound Stage open (presumably when live music is being performed). *The most deeply concerning thing to me is the proposal to EXTEND the hours of operation for these new businesses until 2am three nights a week!* I am wondering how this can comply with the County Ordinance of ending outside music at 10pm? And also how this can be monitored and enforced?

I also have concerns about how many people and how much traffic this will attract; and that people will be parked on the side of the road on Mane Street as well as on Pioneertown Avenue. If there is a wildfire, could fire engines access getting in and out of town? And I also have concern about how much dust this would create on our dirt roads (and inside our homes).

Thank you,

Laura Ransdell, LCSW
56244 Papago Trail, Suite 5
Yucca Valley, Ca, 92284
760-910-5017

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March 15, 2026

Luis Rodriguez, Contract Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave., 1st. Floor
San Bernardino, CA 92415-0187

Subject- Public Comment
SBC Initial Study and Mitigated Negative Declaration
Project Title: Pioneertown Soundstage
Project No.: PROJ-2022-00191

Luis.Rodriguez@lus.sbcounty.gov

Dear San Bernardino County,

Thank you for the opportunity to provide the following public comments regarding the proposed Pioneertown Soundstage development, Initial Study and Mitigated Negative Declaration.

The Initial Study for the proposed Soundstage project is flawed and greatly underestimates the negative impacts of this project. The mitigation proposed in this Initial Study fails to reduce the project's environmental impacts to a less than significant impact level.

In addition the Initial Study and Negative Declaration neglects to consider the cumulative significant impact of the combined environmental effects of a proposed project alongside past, present, and probable future projects.

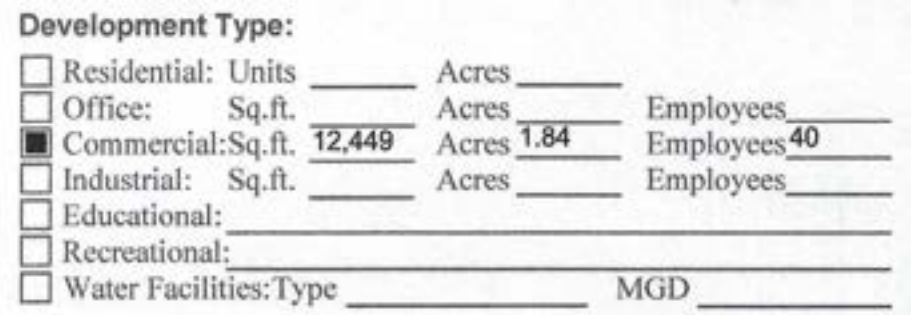
In my opinion given the type of cumulative significant impacts that cannot be mitigated, an Environmental Impact Report will be necessary to provide suitable alternatives and identify the required mitigation for Mane St. and the Pioneertown Area.

Please pay close special attention to my comments pertaining to the fire hazard and public safety issues on Mane St. and the Pioneertown area.

Kerrie Aley
Pioneertown

A. Conflicting and Inadequate Project Descriptions

Notice of Completion & Environmental Document Transmittal



Development Type:

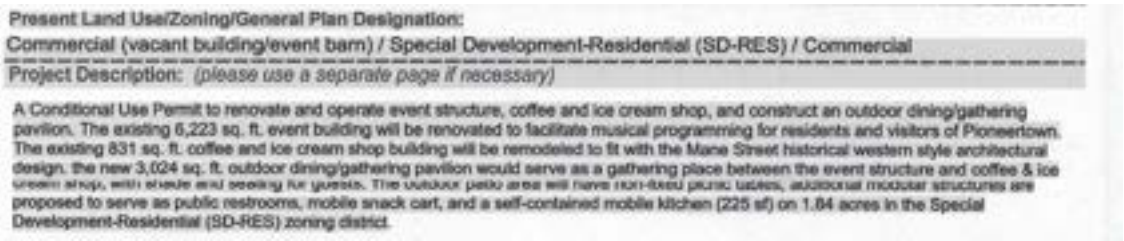
☐ Residential:	Units	_____	Acres	_____		
☐ Office:	Sq.ft.	_____	Acres	_____	Employees	_____
■ Commercial:	Sq.ft.	12,449	Acres	1.84	Employees	40
☐ Industrial:	Sq.ft.	_____	Acres	_____	Employees	_____

☐ Educational: _____

☐ Recreational: _____

☐ Water Facilities: Type _____ MGD _____

1. COMMENT- Commercial 12,440 sq ft = .2858 Acres NOT 1.84 Acres as stated above.



Present Land Use/Zoning/General Plan Designation:

Commercial (vacant building/event barn) / Special Development-Residential (SD-RES) / Commercial

Project Description: *(please use a separate page if necessary)*

A Conditional Use Permit to renovate and operate event structure, coffee and ice cream shop, and construct an outdoor dining/gathering pavilion. The existing 6,223 sq. ft. event building will be renovated to facilitate musical programming for residents and visitors of Pioneertown. The existing 831 sq. ft. coffee and ice cream shop building will be remodeled to fit with the Mane Street historical western style architectural design. the new 3,024 sq. ft. outdoor dining/gathering pavilion would serve as a gathering place between the event structure and coffee & ice cream shops, with shade and seating for guests. The outdoor patio area will have non-fixed picnic tables, additional modular structures are proposed to serve as public restrooms, mobile snack cart, and a self-contained mobile kitchen (225 sf) on 1.84 acres in the Special Development-Residential (SD-RES) zoning district.

2. COMMENT- Present Land Use/Zoning/General Plan Designation: Permitted as a retail NOT Commercial (vacant building/event barn). The owner of this property has been operating as an unpermitted event building that has been documented with numerous code violation complaints.

COMMENT- The Initial Study states that “Note that events held at the Pioneertown Soundstage would be permitted under its proposed Conditional Use Permit (CUP)” indicating that the County agrees that the “event space” is unpermitted.

Present Land Use/Zoning/General Plan Designation:
Commercial (vacant building/event barn) / Special Development-Residential (SD-RES) / Commercial

Project Description: *(please use a separate page if necessary)*

A Conditional Use Permit to renovate and operate event structure, coffee and ice cream shop, and construct an outdoor dining/gathering pavilion. The existing 6,223 sq. ft. event building will be renovated to facilitate musical programming for residents and visitors of Pioneertown. The existing 831 sq. ft. coffee and ice cream shop building will be remodeled to fit with the Mane Street historical western style architectural design. the new 3,024 sq. ft. outdoor dining/gathering pavilion would serve as a gathering place between the event structure and coffee & ice cream shop, with shade and seating for guests. The outdoor patio area will have non-fixed picnic tables, additional modular structures are proposed to serve as public restrooms, mobile snack cart, and a self-contained mobile kitchen (225 sf) on 1.84 acres in the Special Development-Residential (SD-RES) zoning district.

[redacted]	Tenant Improvement	53563 MANE ST, PIONEERTOWN CA 92268 United States	Tenant Improvement on (E) Gazette to include: Convert to a new Coffee Shop, New Mechanical, Electrical, and plumbing throughout 831 SF total ADA parking requirements	Awaiting Client Reply	3		[redacted]
PRDJ-2022-00191	Project Application	53585 MANE ST, PIONEERTOWN CA 92268 United States	CONDITIONAL USE PERMIT TO ESTABLISH A NEW 3,024 SQ. FT. OUTDOOR DINING AREA AND THE REUSE/REMODEL OF AN EXISTING 6,215 SQ. FT. BUILDING FOR AN EVENT AND HOSPITALITY USE AND UTILIZE THE EXISTING 842 SQ. FT. GAZETTE BUILDING AS A CREAMERY/COFFEE SHOP ON THREE SEPARATE PARCELS COVERING 1.84 ACRES ZONED GENERAL COMMERCIAL (CG).	In Review	2	CONDITIONAL USE PERMIT	10/26/2022

3. COMMENT- The square footage in comment used for the Event Building and the Gazette building in the Notice of Completion does not match the description in the project application? The project application states: "CONDITIONAL USE PERMIT TO ESTABLISH A NEW 3,024 SQ. FT. OUTDOOR DINING AREA AND THE REUSE/REMODEL OF AN EXISTING 6,215 SQ. FT. BUILDING FOR AN EVENT AND HOSPITALITY USE AND UTILIZE THE EXISTING 842 SQ. FT. GAZETTE BUILDING AS A CREAMERY/COFFEE SHOP ON THREE SEPARATE PARCELS COVERING 1.84 ACRES ZONED GENERAL COMMERCIAL (CG)."

Note that the application does not indicate the "event structure" used in Comment 1 is a legal prior use.

———-

Tenant Improvement on (E) Gazette to include: Convert to a new Coffee Shop, New Mechanical, Electrical, and plumbing throughout 831 SF total ADA parking requirements

53563 MANE ST, PIONEERTOWN CA 92268 United States

4. COMMENT **This description does not include the outdoor patio.**

5. COMMENT **It is not clear whether a lot merger of the three parcels will be required prior to issuance of a building permit.**

The NOTICE OF AVAILABILITY (NOA) AND NOTICE OF INTENT (NOI) TO ADOPT AN INITIAL STUDY / MITIGATED NEGATIVE DECLARATION indicates that the project is located at-"Project Location: 53585 Mane Street, Pioneertown, CA 92268Assessor Parcel Number(s): 0594-391-(06, 07 and 08)" and does not state that the Gazette building is located at 53563 Mane St.

COMMENT The project description in the Notice of Availability states that the project definition is "Project Description:

"A CONDITIONAL USE PERMIT TO RENOVATE AND OPERATE EVENT STRUCTURE, COFFEE AND ICE CREAM SHOP, AND CONSTRUCT AN OUTDOOR DINING/GATHERING PAVILION. THE EXISTING 6,223 SQ. FT. EVENT BUILDING'S WILL BE RENOVATED TO FACILITATE MUSICAL PROGRAMMING FOR RESIDENTS AND VISITORS OF PIONEERTOWN. THE EXISTING 831 SQ. FT. COFFEE AND ICE CREAM SHOP BUILDING WILL BE REMODELED TO FIT WITH THE MANE STREET HISTORICAL WESTERN STYLE ARCHITECTURAL DESIGN. THE NEW 3,024 SQ. FT. OUTDOOR DINING/GATHERING PAVILION

WOULD SERVE AS A GATHERING PLACE BETWEEN THE EVENT STRUCTURE AND COFFEE &ICE CREAM SHOP, WITH SHADE AND SEATING FOR GUESTS. THE OUTDOOR PATIO AREA

WILL HAVE NON-FIXED PICNIC TABLES; ADDITIONAL MODULAR STRUCTURES ARE PROPOSED TO SERVE AS PUBLIC RESTROOMS, MOBILE SNACK CART, AND A SELF-CONTAINED MOBILE KITCHEN (225 SF) ON 1.84 ACRES IN THE SPECIAL DEVELOPMENT-

RESIDENTIAL (SD-RES) ZONING DISTRICT."

The project description on the NOA has not changed again with the Gazette building at 831 sq ft. In this description "additional modular structures are now proposed to serve as public restrooms. In addition a new "Mobil snack cart and self contained mobile kitchen (225 SF) is also new. The Initial Study show a different configuration with both septic and a composting toilet trailer.

6. COMMENT The Summary Form has a project description which differs from the NOA/ NOI.

"A Conditional Use Permit to renovate and operate event structure, coffee and ice cream shop, and construct an outdoor dining/gathering pavilion. The existing 6,223 sq. ft. event building will be renovated to facilitate musical programming for
residents and visitors of Pioneertown. The existing 831 sq. ft. coffee and ice cream shop building will be remodeled to fit with the Mane Street historical western style architectural design. the new 3,024 sq. ft. outdoor dining/gathering pavilion would serve as a gathering place between the event structure and coffee & ice cream shop, with shade and seating for guests. The outdoor patio area will have non-fixed picnic tables; additional modular structures are proposed to serve as public restrooms, mobile snack cart, and a self-contained mobile kitchen (225 sf) on 1.84 acres in the Special Development-Residential (SD-RES) zoning district.'

B. Separate Parcels or Lot Merger?

1. COMMENT The Initial Study does not note that the Sound Stage and the Gazette building have different address. Does the developer plan to merge the parcels or will the Conditional Uses be allowed on all parcels!?

2 COMMENT The Initial Study "Project Overview states that
"The Applicant proposes to improve an existing 1.84-acre, multi-use commercial site serving the Pioneertown area in unincorporated San Bernardino County (refer to Figure 3). " This is incorrect as the project consist of 3 separate parcels and there are no permits existing indicating that the 1.84 acre parcels is a "multi-use commercial site".

C. Initial Study Excludes the Environmental Impact of the proposed 500 person Event Center

1. COMMENT The Initial Study states that "Note that events held at the Pioneertown Soundstage would be permitted under its proposed Conditional
Use Permit (CUP)" yet the entire environmental review fails to study the 500 person indoor outdoor facility which has the greatest environmental impact.

D. Composting Toilet

2 COMMENT **Composting Toilet Trailer & Overloaded Septic Systems-** It is not clear from the description whether the new modular public restrooms and mobile kitchen will be on a septic system or use tanks which are pumped out.

However the drawing in the Initial Study proposes a "composting public restroom trailer". The Initial Study fails to note that a centralized composting system would be required. This is an important distinction is the difference between self-contained and centralized systems. Self-contained systems are sold as a single-unit and are generally used in rural, single family residential applications as they cannot process large volumes of waste.

Comparison of self-contained and central (remote) composting toilets
In a centralized system (also known as a remote system), the toilet connects to a composting tank that is usually located below grade. Centralized systems can process more waste than self-contained systems and are generally installed in remote areas for hikers and campers. SBC EHC does not appear to have a policy on centralized composting toilets. In addition composting toilet waste requires special handling to remove the waste. Because of this the Initial Study must consider the negative environmental impact of the trailer toilets.

The public avoids portable toilet facilities and either overloads the venues septic, tries to use nearby business toilets overloading their septics or they relieve themselves by peeing and pooping on building and pubic spaces.

E. Septic, Portal Potties and Toilet Trailers and Public Public Toilet Issues

COMMENT The Sound Stage has overloaded its septic by renting out the space to large unpermitted private events. The Red Dog Saloons septic has emitted foul smells when the indoor and outdoor areas are filled with people. Pappy and Harriets has gone to using 10 ports potties and the public avoids these units and walks over to the Bowling Alley and Red Dog Saloon to use those indoor toilets. Pappy and Harriets septic system appears to be in poor condition as in 2020 two emergency septic seepage pits installed. In 2 hour period one evening during the week I was at the Bowling Alley and watched 20 people walk in from Pappy & Harriets and tried to use their toilets.

Given what I have seen what is going to prevent the Soundstage's septic from becoming overloaded with another uncontrolled increase in public usage when every other septic is subject to be over utilized by the public?

F. Parking & Traffic Impacts

COMMENT The project proposed 50 parking spaces. The analysis ignores the proposed SoundStage Indoor/Outdoor 500 person venue or the employee parking needed.
This does not meet SBC's parking requirements.

SBC's Public Works threshold for a project Traffic Study is 100 cars/hour at peak periods. It is very likely that the Sound Stage 500 person event venue will produce a traffic volume that would merit a Traffic Study.

Pappy & Harriets has greatly increased the attendance of the music venue. The Red Dog regularly has live entertainment that attracts crowds. Pappy & Harriet's has submitted an application asking for another 40 outdoor music events which will increase the traffic. The approved Pioneertown Motel Expansion also will have dining and live entertainments. There has been no mitigation at all proposed.

There are NO stop lights in the Pioneertown Area and lots of side driveway & side street access conflicts with vehicles that are traveling upwards of 50 mph on Pioneertown Rd. Frequently tourist slam on their brake when they see the "Pioneertown" sign and pull off in dangerous curved/hill areas to take photos. On days where there are multiple events or large concerts the area is becoming unsafe to both motor vehicles and pedestrians.

G. Fugitive Light Impacts

For informational purposes, the proposed project would be compatible with the Countywide Policy Plan's visual resources and aesthetic policies including:

Policy LU-2.1 Compatibility with existing uses. We require that new development is located,scaled**, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development.**

o The proposed project is on a similar scale as the surrounding uses and to that which exists on site presently.

1. COMMENT- The size of new 500 person music venue is out of scale with the local small town community. Pappy & Harriets music venue has expanded their operation to include multiple concurrent shows and large events on the parking lot. The Sound Stage proposes to act in a similar manner ignoring the sensitive receptors of people living in residential units on Mane Street and nearby residential areas.

Policy LU-4.7 Dark skies. We minimize light pollution and glare to preserve views of the night sky, particularly in the Mountain and Desert regions where dark skies are fundamentally connected to community identities and local economies. We also promote the preservation of dark skies to assist the military in testing, training, and operations.

o The County has adopted the San Bernardino Night Sky Ordinance. All new development, including the proposed project, may incrementally change conditions of nighttime views and the character of dark skies, but the project would be required to adhere to County standards for lighting and glare to ensure that impacts to night skies would be minimized to a level of less than significant (refer to analysis presented in issue I(d), below).

2. COMMENT **String Lights** While SBC's Dark Sky Ordinance does require that lighting be shielded it does allow the use of un-shielded string lights. Pappy & Harriets has long strands of strings lights hung throughout their outdoor areas which have contributed to a loss of dark sky in this area. The size of this new public facility is so large it will greatly contribute to the quality of nighttime sky viewing due to code requirements for lighting in commercial spaces.

The project can only state that the existing County standards for lighting and glare ensure that impacts are minimized to a level of less than significant only if the developer agrees to use shielded string lights in this project and all other door lighting must be dark sky compliant.. CEQA also requires that cumulative impacts from other probable projects are considered.

3. COMMENT **Vehicle Head Lights** The County has approved an expansion of the Pioneertown Motel. Pappy & Harriet's has expanded the number of nighttime music events from 3 nights a week to sometimes 6 times a week. In addition Pappy and Harriet's is now overselling its venues with 1200 people outdoors and up to 400 people indoors. They have run both the indoor and outdoor events concurrently. Pappy & Harriets has an application in to permit an additional 40 outdoor events. If you add up all the potential cars that will enter or leave the Mane St. area between 8 PM and 12 AM the number of vehicles could exceed 1000 cars or more. Given that the parking for Mane Street are on Pioneertown Rd and directly point directly at residential homes between Curtis and Minna Gombell I can image the entire area being blasted with headlights pointed at homes for hours in a rural area with dirt roads. Clearly what is being proposed will create significant environmental impact for residents.

The Initial Study's statement that "*Less Than Significant Impact* – Implementation of the proposed project will create only limited new sources of light during the occupancy phase of the project. Existing sources of light in the project area include nearby rural residences and **occasional headlights** from the adjacent roadways." Is ridiculous and violates the requirements of CEQA. I see NO mitigation possible for the vehicle headlight pollution except to limit the size and use of these venues.

H. Parking Lot and Pedestrian Fugitive Dust

COMMENT-Consistency Criterion No. 2
All MDAQMD Rules and Regulations
The project would be required to comply with all applicable MDAQMD Rules and Regulations,including, but not limited to Rules 401 (Visible Emissions), 402 (Nuisance), 403 (Fugitive Dust), and1113 (Architectural Coatings).

Fugitive Dust- The three parcel are currently in violation of the MDAQMD rules for fugitive dust. The existing dirt parking lot has degraded to the point that it fails the MDAQMD dropped ball test for soil compaction. Other parts of Mane St are also doing similar degradation of the compacted granite surface. The property owner has allowed Pappy and Harriet's to use this properties parking lot as overflow for its oversold events. Pappy and Harriet's parking lot is so degraded that dirt from the 1,000s of cars is piling up onto Pioneertown Rd.where it is picked up by passing cars traveling at 40-50 mph blowing dust everywhere..

This image is fair representation of the condition of the Mane St. parking yet there is no mention of the existing Code Enforcement complaints in this Initial Study.





I. Toilet Waste Handling

IX. HAZARDS AND HAZARDOUS MATERIALS
SUBSTANTIATION
Impact Analysis. Less Than Significant Impact – The project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

COMMENT. The project proposes to use a commercial composting toilet. California considers the compost from toilets to be a hazardous material which requires special handling as it can pose serious danger to public health. The Initial Study fails to analyze the impact from the trailer composting toilets waste.

I. Septic Sizing and Ground Water Contamination

X. HYDROLOGY AND WATER QUALITY

The project proposes "The new septic tank system will be capable of handling about 2,000 gallons of waste per day and will be developed in accordance with current California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards, which sets parameters for private sewage disposal, and in compliance with the County Development Code, Article 6.

COMMENT. The project proposes a septic tank that will be capable of handing about 2,000 gallons per day. 2,000 gallons of water per day can support a range of operations depending on the intensity of water use: Mid-Size Office Buildings: Approximately 100 employees (based on 15–20 gallons per person/day). Industrial/Commercial Settings: Around 55–100 employees (based on 20–35 gallons per employee/day, depending on if showers/kitchens are included).Restaurants: Roughly 65–100 seats (based on 20–31 gallons per seat/day).Day Resorts (with limited plumbing): About 55-60 guests (based on 35 gallons per person/day).

The septic system for this project is undersized for the proposed use. The septic systems on Mane St are already stressed capacity. The use of portable trailer toilets have resulted in the surrounding businesses septic systems to be overloaded. In addition many of the business septic systems have operated beyond their capacity of useful life creating an undetermined health impact to local residents who depend on wells.

It should be pointed out that contamination of the the ground water will migrate downwards to the wells near the bottom of Pioneertown Rd.which will degrade the metered water for Mane St. and the nearby homes who have metered water service.

J. Wildfire Safety Planning

XX. WILDFIRE: 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?

The Initial Study states that the project will result in less than significant impact- a) Substantially impair an adopted emergency response plan or emergency evacuation plan. This analysis is incorrect for a number of reasons.

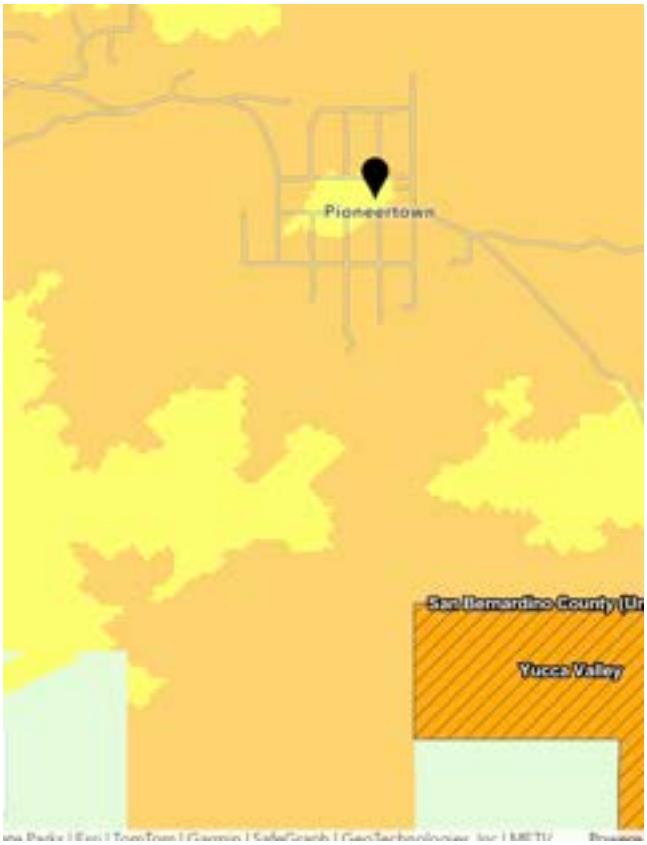
Impact Analysis

a. Less Than Significant Impact – According to the CAL FIRE Fire Hazard Severity Zone Viewer Map (Figure IX-4), the proposed project is located in an area with **Moderate wildfire** risk and is located within a State Responsibility Area (SRA).

1. **Comment** The Initial Study is incorrect, Pioneertown and Mane St are located in a "State Responsibility Area" , CALFIRE with a Fire hazard classification as shown in the image below. While the project area is within a "Moderate" Fire Hazard Severity Zone this analysis completely ignores the surrounding area and the surround properties and evacuation routes are considered "High" Fire Severity Zones. The writer is the Group Leader for the Pioneertown Area Firewise Community and frequently interfaces with the San Bernardino County Fire Agency and CALFIRE.

Source- CAL FIRE Hazard Severity Zone https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones





Here is a picture of Pappy & Harriets in 2006 during the Sawtooth Complex Fire.



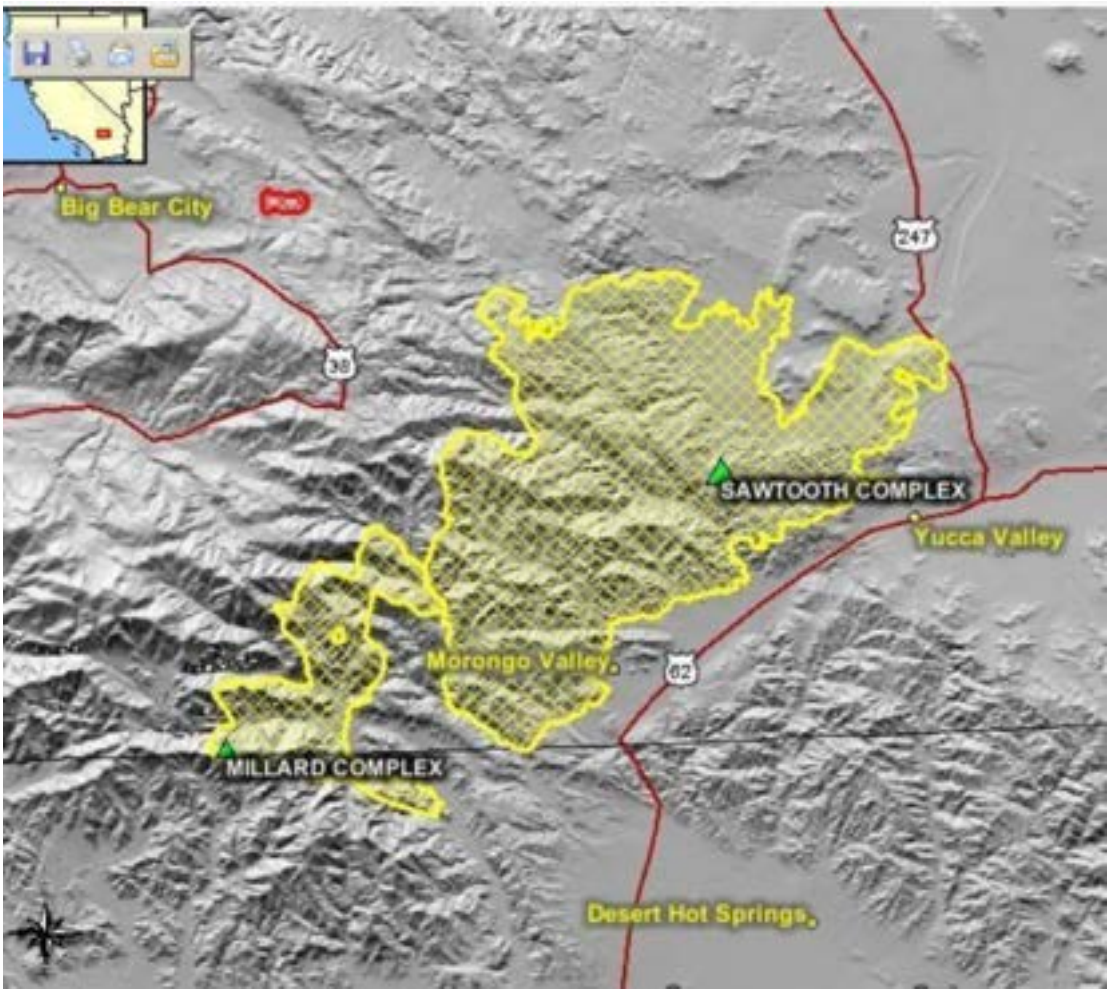
Emergency Routes

The initial study states that:
As shown on the Evacuation Route Map prepared for the San Bernardino Countywide "Plan (Figure IX-3), the adopted evacuation routes in the area are Highway 62 to the southeast of the project site, and Highway 247 to the east of the project site.

A de facto evacuation route in the vicinity of the project site would be Pioneertown Road, which traverses through the community. The proposed project is not located along a County identified emergency route, nor would implementation of the project impede emergency response from accessing the site or surrounding area. Additionally, the proposed project would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. **The project is located within a moderate fire hazard severity zone and impacts to emergency response and/or emergency evacuation plans are considered less than significant, especially given the low density of vegetation on and adjacent to the project site. No mitigation required"**

2. COMMENT
This Initial Study fails to recognize the potentially fire safety situation in the Pioneertown Area . In 2006 the Sawtooth Complex fire destroyed 50 structures and over 61,000 acres.

You can see from the fire map below the perimeter of the Sawtooth Complex fire which shows how the prevailing wind patterns created a firestorm that made evacuation difficult if not impossible..



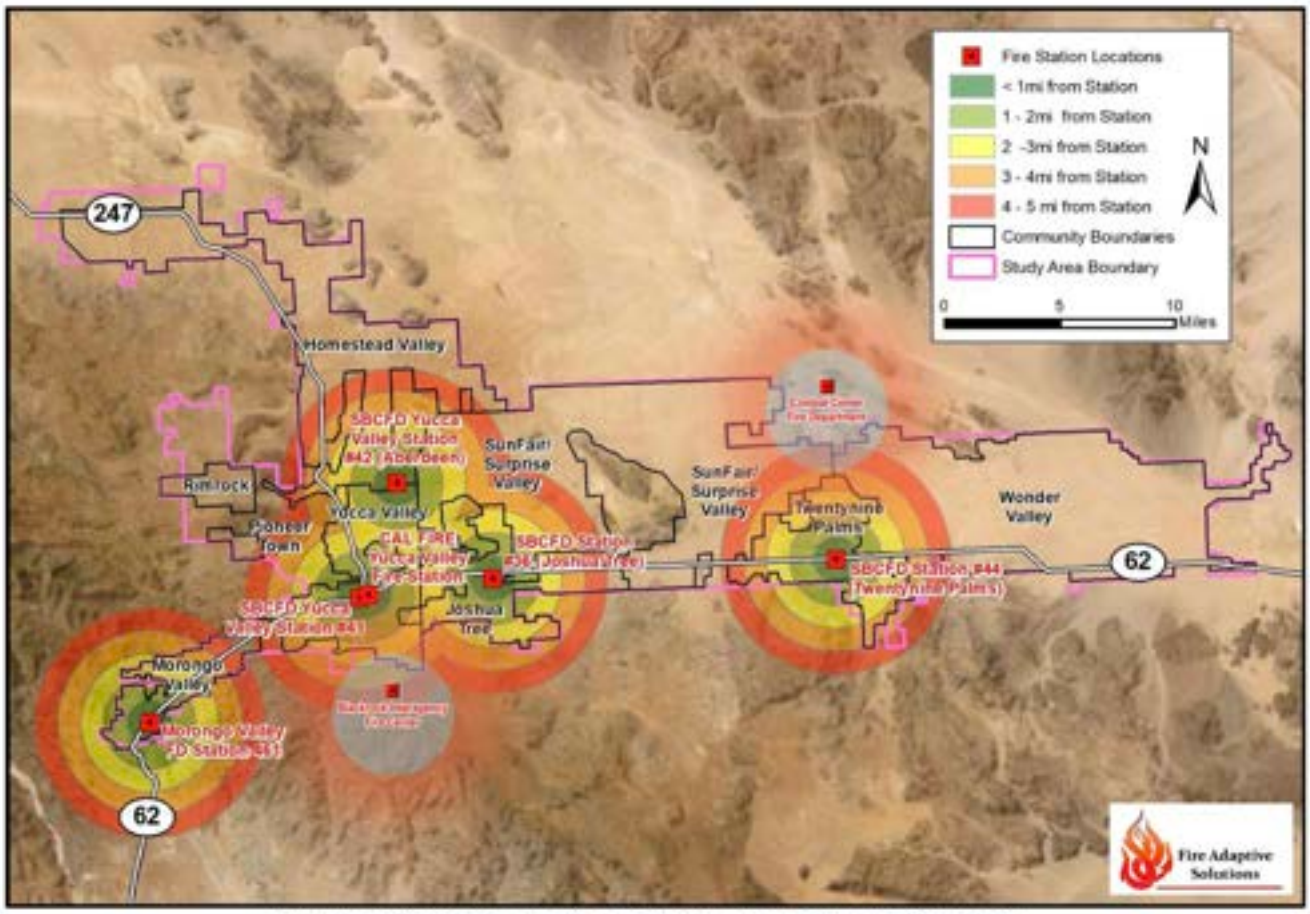


Figure 4, Fire Station Locations Within Assessment Area Boundaries

The writer of this Initial Study seems to think that 247 and 62 are the only important evacuation routes and that Pioneertown road is merely a “De Facto”way out.
There are only two improved paved roads in the Pioneertown Area, Pioneertown Rd (to 62) and Pipes Canyon Rd (to 247). Many resident here have 4 wheel drive vehicles should we have to use off road routes to evacuate.

The Initial Studies claim that the development’s impacts on “emergency evacuation plans” are “considered less than significant, especially given the low density of vegetation on and adjacent to the project site. No mitigation required””. This CEQA analysis is incorrect and must be revised.

As pointed out in the Morongo Basin Wildfire Community Protection Plan Pioneertown Rd and Pipes Canyon Rd are flanked by the accumulation of dry combustable vegetation and thousand of acres of undeveloped conservation land.

In response to the unaffordable wildfire insurance rates in this area we formed the Pioneertown Area Community Firewise group to encourage creation of 100 ft defensible spaces around residential structures.. This Initial Study ignores the CA Fair Plan Insurance Pioneertown “high fire hazard community ratings”.

The Initial Study also fails to mention that there are NO operating Fire Stations in Pioneertown, You can see the proximity of Mane St to the nearest Fire Station in this image below.. (Source- Morongo Basin Community Wildlife Community Protection Plan 2023)

3. COMMENT-
Pioneertown is in a high fire hazard area and the closet Fire Station is over 6 miles away. Pioneertown Mane St. should be maintained as a small scale residential and tourist serving center. Large scale tourist accommodations should be place in low hazard areas, close to emergency services with adequate infrastructure.

Within this Joshua Tree Woodlands terrain a wildfire can spread at the speed of 25 miles an hour. This study does not adequately consider the added requirement to evacuate all these visitors along with residents.

The idea that Mane St can be safely built up to accept 1,000s of visitors on Mane St. ignores the negative impact of these development will have on emergency service from the San Bernardino County Fire Agency and CALFIRE to residents should a wildfire occur.

4. COMMENT
The Initial Study continues its deluded analysis of the environmental conditions in the Pioneertown Area as follows-

"**Wind in the project**
area ranges from about 11 miles per hour (mph) to 13.3 mph,28 and the National Weather Service defines a "gentle breeze" as 8-12 mph, with a "moderate breeze" as 13-18 mph.

The proposed project is surrounded by residential and commercial development in all directions. Given the minimal potential for wildfire within the project site and project area because the proposed project is located only in a moderate FHSZ, rather than a high or very high FHSZ, and the lack of fuel necessary to result in uncontrolled spread of wildfire, there is a less than significant potential for the proposed project to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Impacts under this issue are considered less than significant. No mitigation is required."

5. COMMENT As someone who lives here I can state that winds out here frequently exceed 40-60 mph. During the Sawtooth Fires the winds were over 80 mph. I recently applied for permits to fire harden my house and the SBC Fire Overlay requirements required structural changes to accommodate 120 mph winds.

The writer of this Initial Study apparently does not think our desert can burn, the winds speeds are low and the exposure of visitors at this development due to wildfire impact are less than significant. No mitigation needed. This analysis violates the requirement of CEQA and should not be approved.

6. “CEAQ Section IX (g) of the checklist broadly directs lead agencies to consider whether a project will “expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wild land fires.” Lead agencies must consider both on- and off-site impacts. Several variables should be considered in analyzing a project’s impact on wildfire risk, including:Project Density

Project density influences how likely a fire is to start or spread, and how likely it is that the development and its occupants will be in danger when a fire starts. Fire spread and structure loss is more likely to occur in low-to-intermediate-density development. This is because there are more present to ignite a fire (as compared to undeveloped land), and the development is not concentrated enough (as compared to high-density developments) to disrupt fire spread by removing or substantially fragmenting wildland vegetation. The conflict here is that the very reason many people visit rural communities like Pioneertown is to enjoy low-density development.

Project Location in the Landscape
Project placement in the landscape relative to fire history, topography, and wind patterns.
Water Supply and Infrastructure

Analyze the adequacy of water supplies and infrastructure to address firefighting within the project site. The analysis should consider the potential loss of water pressure during a fire, which may decrease the available water supply and the potential loss of power, which may eliminate the supply.

Lead agencies are encouraged to develop thresholds of significance that either identity an increase in wildfire risk as a significant impact or determine, based on substantial evidence, that some increase in the risk of wildfires is not considered a significant impact.
Lead agencies must consider the wildfire risks, landscape, and development for new development. This includes the density of housing, topography, and water supply as well as evacuation routes.”

COMMENT
The Initial Study failed to meet the above requirement of Section IX.

In addition the Pioneertown area is being considered as a possible refugio as part of the Western Joshua Tree Conservation Plan due to the higher elevation and multiple desert washes which encourage a wide biological diversity. The Pioneertown Area is considered an area of “Critical Environmental Concern” in the BLM’s DRECP. Within Pioneertown ares there are thousand of acres which have been set aside as conservation land including parts of the Sand to Snow National Monument near Black Lava Butte.

Increased human activity in fire prone areas has been show raises the probability of non-natural wildfires which not only affects the residents but our natural resources.

Please consider the negative impact of all this development and human activity will have on Western Joshua Tree which is a candidate for endangered species and the habitat necessary for propagation of the species in the future.

8. COMMENT While unusual, it is appropriate to include in this CEQA fire analysis a comment that shows the propensity of the property owner/developer to light Mane St on fire creating a firestorm that destroys the rest of Mane St. and the entire Pioneertown Area.

During the pandemic the property owner rented his Sound Stage to a large group without the required Special Event permits. There was an unsupervised loud all night disco party in the Sound Stage. If that was not enough the visitors were allowed to build multiple fires including a giant Cowboy effigy on Mane St that was lite on fire. My husband and I happened to be on Mane St and I can confirm that this event did happen and that the emergency fire personal were called to put the tourist fire out!

Remember that one time that [redacted] (actually [redacted] worked to save the town by inviting an EDM DJ and a hundred influencers to have an unannounced or permitted party in the middle of Mane St.? As an extra gift to "gain the trust of the town" that mostly suffers from PTSD created by nearly getting burned up in multiple fires, and in the middle of the dry no-burn season they lit a giant fire. True to form, when the fire department arrived, [redacted] snuck away and sped off leaving everyone else to hold the bag.



9. Mandatory Findings of Significance

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

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)?

COMMENT This entire Initial Study ignores the sizable cumulative impact of approved, expanded and probable developments in the future.

The projects that should of been included in this cumulative impact analysis are-

- Expansion of Pappy & Harriet's operation from approximately 580 people outdoor event to approximately 1200 people (with the addition of porta-poties).
- Expansion of Pappy & Harriet's operation from approximately 260 people to over 400 people indoors. (They now claim that they have stopped over-selling tickets)
- Expansion of Pappy & Harriet's operation to include multi-day events with events outside and indoor at the same time. Included in these unpermitted events are vendors, camping, overflow parking on vacant lots on on the streets..
- Unpermitted special events on Mane St.
- Unpermitted special events and retail on Curtis St.
- The approval of the Pioneertown Motel Expansion.
- An application by Pappy & Harriets to expand their outdoor shows by 40 evenings, 25 vender spaces and an unknown number of special events..
- An application to add a store cafe at the Adobe near the Post Office on Mane St.
- The San Bernardino County project for the Mane St. Overlay which is being drafted and will be available in the few months.

The Initial Study is also lacking a proper Traffic Study as the cumulative impact of the expanded operations and proposed new developments clearly meet the minimum standard for study of 100 vehicles per hour increase in traffic.

In addition there should be a discussion as to new ABC Alcohol permitting on Mane St. The expansion of business with the addition of more alcohol service in this tiny town with no assigned Sheriff's , Fire Stations, EMTs will result in an increase in calls for service, bring big city crime to Pioneertown, increase the likelihood of a human set fire and negatively impact the quality of life of local residents.

I also support other residents opinions that the Sound Stage project noise analysis is inaccurate and that that the music venues and events are currently disturbing local resident's ability for quite peaceful enjoyment of their properties.

The extremely poor condition of Mane St. dirt parking lots are a violation of the businesses conditional use permits which require the implementation of a MDAMQD Dust Management Plan. All code violations would be fixed before any business is allowed to expand their business.

The over stressing of septic systems endangers both residents on wells and the supply of metered public service water.

The overflow of parking onto to Pioneertown in an area with vehicle speed of 40-50 mph are creating a public nuisance and safety issue.

Conclusion-
Based on critical flaws in the Pioneertown Soundstage Initial Study which include an inaccurate project description AND the lack of credible evidence to support analysis's findings regarding noise, water & air quality, traffic, parking impacts, and fire safety conclusions, I strongly recommend that the San Bernardino County Planning Commission vote to reject the Mitigated Negative Declaration for the Pioneertown Soundstage Project.

Kerrie Aley
Pioneertown

From: Keri Brunelle
To: Rodriguez, Luis
Subject: Pioneertown Soundstage
Date: Wednesday, April 15, 2026 8:57:01 AM

You don't often get email from keri@tsmoffice.com. Learn why this is important

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

To Whom it may concern,

I am writing today on behalf of my family who have been residents of this town for over 40 years. My residence is on the same side of Pioneertown Rd as the Soundstage, behind the town. I was invited to a town meeting about this Soundstage where Mr Courso had attended. He stood up in front of the entire room to state that this had nothing to do with a nightclub or dance cafe. He stated that those were rumors and that this time extension was simply for weddings that might extend past their 10PM end time. He had a nice smile and was slightly convincing. Then I thought why would any wedding need 4 hours to wrap up? How could a wedding or any event continue until 2:00 a.m. if the noise and music must end by10? Then I read the document. Night Club, Dance Cafe, Open til 2:00am? In a normal city that is ok. this is not a city. This is a tiny town, squeezed inbetween two hills. Everything echoes. I can hear my neighbors talking on a quiet night. This would also be an open the door for every other business in our town to get the same privileges. The people who live here do so because of the beauty, the peace, the night sky, and the amazing sunrises. The people who profit from this town do not live here. They don't have to deal with the negative consequences as their wallets get fatter. With that, I hope you listen to the residents.
--
Thank you
Keri Suppes

Total Service Modular Inc.
1219 S Atlantic Blvd, CA 90022

714-441-9672 Office

TOM DODSON & ASSOCIATES

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Physical Address: **2150 N. Arrowhead Avenue, San Bernardino, CA 92405**
Tel: (909) 882-3612 ✦ Email: tda@tdaenv.com ✦ Website: tdaenvironmental.com

MEMORANDUM

July 22, 2026

From: Kaitlyn Dodson-Hamilton

To: Mr. Luis Rodriguez

Subj: Completion of the Initial Study/Mitigated Negative Declaration for the Pioneertown Soundstage Project PROJ-2022-00191 (SCH #2026020532)

The County of San Bernardino (County) has distributed the Initial Study/Mitigated Negative Declaration (IS/MND) for the Pioneertown Soundstage Project PROJ-2022-00191 (SCH #2026020532) for public review with the review starting on February 13, 2026 and ending on March 16, 2026. The County has received 6 written comment letters on the IS/MND for the Pioneertown Soundstage Project PROJ-2022-00191. CEQA requires a Negative Declaration to consist of the Initial Study; copies of the comments; any responses to comments as compiled on the following pages; and any other Project-related material prepared to address issues evaluated in the Initial Study.

For this Project, the original Initial Study will be utilized as one component of the Final Mitigated Negative Declaration (MND) package. The attached responses to comments, combined with the Initial Study and the Mitigation Monitoring and Reporting Program, constitute the Final MND package that will be used by the County to consider the environmental effects of implementing the proposed Project.

The following parties submitted comments. The comments in this letter are addressed in the attached Responses to Comments:

1. Sean Noonan
2. Ben Loescher
3. Kerrie Aley
4. Mojave Desert Air Quality Management District
5. Colorado River Basin Regional Water Quality Control Board
6. Anonymous (Concerned Resident)
7. Curt Sautter
8. Ben Loescher (#2)
9. Nancy Olsen
10. Daniel D. Paul, Architectural Historian
11. Morongo Basin Conservation Association
12. Kerrie Aley

What follows are responses to each of the above comment letters.

Because mitigation measures are required for this Project to reduce potentially significant impacts to a less than significant level, the Mitigation Monitoring and Reporting Program (MMRP) attached to this package is required to be adopted as part of this Final MND package. The MMRP has been incorporated by reference to this package for approval and implementation. The County consideration of the proposed Project and adoption of the Mitigated Negative Declaration will occur at a hearing before Planning Commission on October 22, 2026.

Do not hesitate to give me a call if you have any questions regarding the contents of this package.



Kaitlyn Dodson-Hamilton
Attachments

RESPONSE TO COMMENT
LETTER #1
Sean Noonan

1-1 The comment requests to be notified of the public hearing date for the Project, which County Staff will ensure occurs prior to the Planning Commission hearing at which the Project will be considered.

The comment also provides text quoted from the Transportation Screening Assessment (TSA) and Initial Study related to the Vehicle Miles Traveled (VMT) Screening procedures utilized for the Project.

Note that the claim that the conclusion in the TSA and IS analyses does not simply, as stated in this comment, determine that the Project would have a less than significant VMT impact because the Project would consist of less than 10,000 square feet (SF) or less addition to an existing building. The IS conclusion under issue XVII(b) states "Based on the size and hours of operation of the supplemental services, they would not be significantly relevant outside the local area, and they provide retail services with less than 50,000 square feet for the local themed retail area." This conclusion utilizes the San Bernardino County Transportation Impact Study Guidelines (July 2019) (County Guidelines) VMT Screening Criteria of "local serving retail less than 50,000 SF."

Note that the Final IS/MND, as revised through these responses to comments, shall be revised to reflect that not only does the proposed Project meet the Project Type Screening because it consists of local-serving retail less than 50,000 SF in size, but as stated in the TSA, the proposed Project also meets the Low VMT Area Screening Criteria. The following has been extracted from the TSA:

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.

Based on the VMT Screening Tool results for the project site, located within TAZ 53980101, the baseline year (2025) VMT per service population for the project TAZ is 30.2, which is four percent (4%) or more below the County baseline (39.0 VMT per service population) or the threshold of 37.4 VMT per service population. Therefore, the proposed project satisfies the County-established screening criteria for projects located in a low VMT area and the project's VMT impact would be less than significant. Attachment B contains the SBCTA VMT Screening Tool results for the project site.

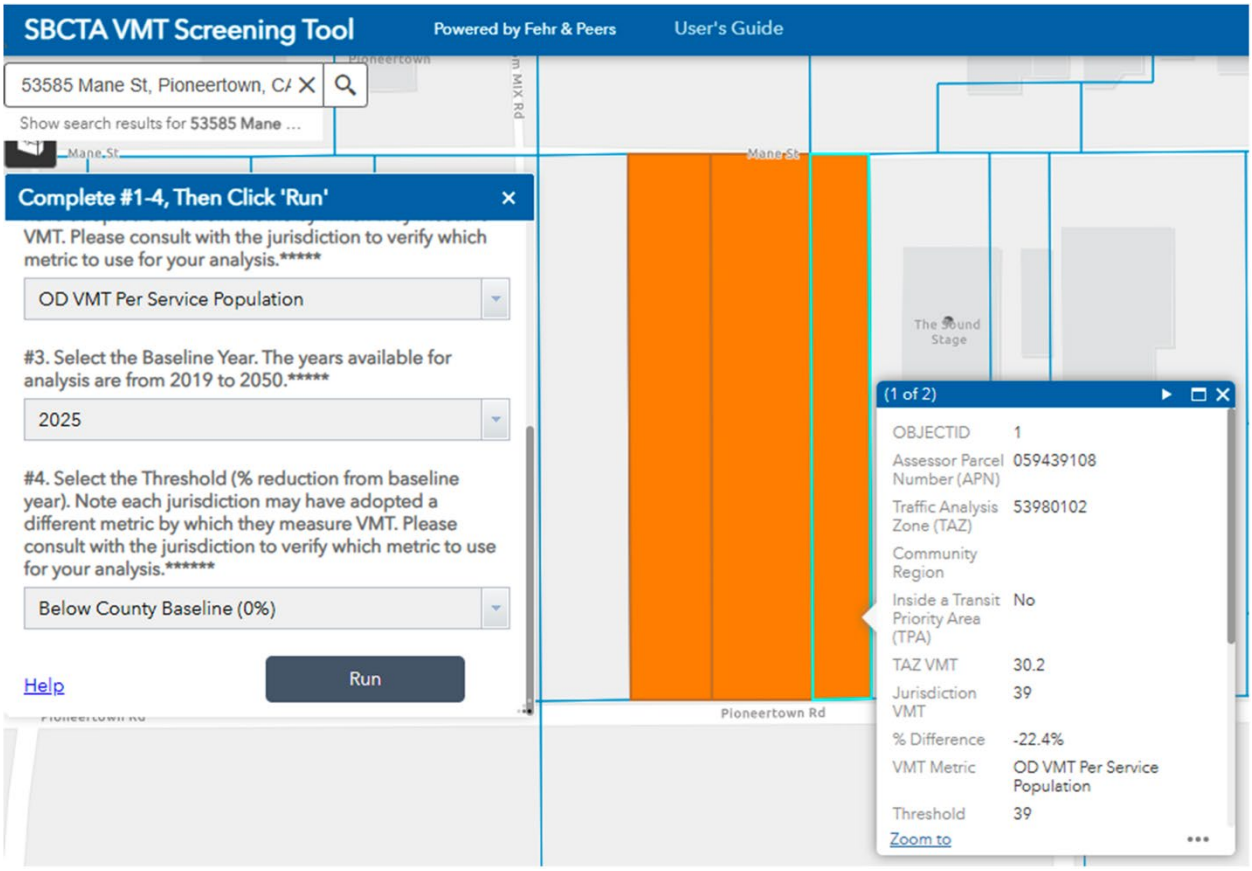
Note that the SBCTA VMT Screening Tool utilized to determine whether the Project meets the VMT Screening Criteria was developed from the San Bernardino Transportation Analysis Model (SBTAM) travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs).

The County Guidelines were developed and adopted by the County in 2019, and are used for every project proposed for approval by the County decision-makers, where VMT and Traffic Analyses must be reviewed and analyzed. Note that the San Bernardino County's County Guidelines VMT thresholds were developed in partnership with Fehr & Peers, which conducted a detailed analysis to be used as substantial evidence to support a recommended threshold that is achievable by development within the

unincorporated County area. This Technical Memorandum, with a Subject of "SB 743 Implementation Thresholds – Alternative Threshold Guidance" is found at the link in the footnote[1] below.

In reference to the statement that "The OPR Technical Advisory provides a categorical exemption for existing facilities including additions to existing structures of up to 10,000 square feet" found in the TSA and abstracted in the IS/MND, on page 10, footnote 6, the OPR Technical Advisory notes that the CEQA Guidelines themselves offer a Categorical Exemption for existing facilities. This Categorical Exemption (15301(e)(2) exempts additions to existing structures of up to 10,000 square feet, so long as the Project is in an area where public infrastructure is available to allow for maximum planned development and the Project is not in an environmentally sensitive area. This information was provided in the IS/MND as background information on the County Guidelines that might apply to the proposed Project. However, these responses to comments correct the record to reflect that the intent of the inclusion of this information in the TSA and IS/MND was not to suggest that the addition of up to 10,000 SF associated with the proposed Project justifies the Project meeting the projects generating less than 110 trips portion of the VMT Screening Criteria. The proposed Project does provide retail services with less than 50,000 square feet for the local themed retail area, and therefore would be a local serving use, which therefore reduces the VMT to reach the Project site. Further, as described in the paragraphs above, the proposed Project also meets the Low VMT Area Screening Criteria by way of the use of the SBCTA VMT Screening Tool. See the Exhibit Extracted from Attachment B of the TSA, below.

[1] https://countywideplan.sbcounty.gov/wp-content/uploads/sites/125/2020/10/Alternative-Reduction-Target-TDM-Memo-03.26.2019.pdf



1-2 The comment states that the County's TIA guidelines allow developers to use VMT screening criteria in 2025. The County is not aware of any litigation against its own County Guidelines and VMT Screening Criteria contained therein. It appears that the commenter is utilizing the *Cleveland National Forest Foundation v. County of San Diego (2025)* Fourth District Court of Appeal (Div. 1) referenced later under Comment 1-4, and is applying this decision to San Bernardino County's County Guidelines. This judgment is specific to the County of San Diego's VMT screening criteria, and does not apply to San Bernardino County. Further, as stated under response to comment 1-2, above, the San Bernardino County's County Guidelines VMT Screening Criteria and Thresholds were developed in partnership with Fehr & Peers, which conducted a detailed analysis to be used as substantial evidence to support a recommended threshold that is achievable by development within the unincorporated County area. This Technical Memorandum, with a Subject of "SB 743 Implementation Thresholds – Alternative Threshold Guidance" is found at the link in the footnote[2] below.

1-3 The comment suggests that the IS/MND and TSA do not justify why a Project consisting of 10,000 SF or less of space would have a less than significant impact related to VMT. The County has relied on its San Bernardino County Transportation Impact Study Guidelines (July 2019), which remain valid because, as stated above, the *Cleveland National Forest Foundation v. County of San Diego (2025)* Fourth District Court of Appeal (Div. 1) judgment does not apply to any other jurisdiction's VMT screening criteria or VMT thresholds. Further, refer to response to comment 1-1, above, which demonstrates that the 10,000 SF or less Screening Criteria referenced herein and throughout Comment Letter #1 does not apply to this Project. The proposed Project does provide retail services with less than

[2] https://countywideplan.sbcounty.gov/wp-content/uploads/sites/125/2020/10/Alternative-Reduction-Target-TDM-Memo-03.26.2019.pdf

50,000 square feet for the local themed retail area, and therefore would be a local serving use, thereby meeting the Project Type Screening. Further, the proposed Project also meets the Low VMT Area Screening Criteria by way of the use of the SBCTA VMT Screening Tool.

RESPONSE TO COMMENT
LETTER #1
Sean Noonan

1-4 The comment further discusses the *Cleveland National Forest Foundation v. County of San Diego (2025)* Fourth District Court of Appeal (Div. 1) judgment, which the County has established in responses to comments 1-1, 1-2, and 1-3, above, does not apply to the San Bernardino County Transportation Impact Study Guidelines (July 2019).

1-5 The comment conveys concern that the County improperly relies on the Screening Criteria that were developed in the OPR Guidance, that were, in turn, determined to be invalid for use in the County of San Diego per the *Cleveland National Forest Foundation v. County of San Diego (2025)* Fourth District Court of Appeal (Div. 1) judgment. This Project utilizes the Project Type Screening not the "Screening Threshold for Small Projects" wherein projects that generate fewer than 110 trips per day are presumed to result in less than significant VMT impacts. The Project meets the Project Type Screening because it is a local serving retail use less than 50,000 SF in size per the County Guidelines. Further, the Project meets the Low VMT Area Screening Criteria by way of the use of the SBCTA VMT Screening Tool. Refer to response to comment 1-1 for an expansion of the Low VMT Area Screening Criteria threshold.

1-6 The commenter requests that the IS/MND be updated and recirculated for public review. The County has determined that recirculation is not necessary at this time. The TSA correctly identifies the Project as meeting the Low VMT Area Screening Criteria and Project Type Screening as a local serving retail use less than 50,000 SF in size, and these responses to comments expand the impact analysis presented in the IS/MND to reflect that:

1. The Project meets the Low VMT Area Screening Criteria
2. The Project meets the Project Type Screening as a local serving retail use less than 50,000 SF in size, and,
3. The 10,000 SF Trip Screening threshold for projects presumed to generate less than 110 daily trips is further clarified to be presented for informational purposes in the TSA and IS/MND as it does not apply to the Project because, as stated under response to comment 1-1, the Project has been determined to generate greater than 110 trips per day.

The analysis in the IS/MND therefore remains valid and this correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Section 15073.5.

1-7 This is a conclusory comment. The contact information provided herein will be retained in the Project file.

RESPONSE TO COMMENT
LETTER #2
Ben Loescher

2-1 This comment conveys that the TSA indicates that no new trips would be generated by the "night club/event use." As stated in the TSA, this is because the continued existing use of the Soundstage is exempt from the transportation screening assessment as an existing use.

The comment also conveys concern that there is not adequate parking provided by the Project to support the proposed and existing uses. The proposed parking for the Soundstage / Café expansion site is addressed below and in accordance with Section 83.11.030 of the County's Development Code (CDC).

Of importance to note, the proposed 'Project' site is utilizing facilities, buildings and other structures that have been utilized for retail / commercial / entertainment, "From conception, the Western-themed buildings comprising the Pioneertown Mane Street Historic District were intended operate as actual commercial businesses during non-filming periods."

The Silver Dollar constructed in 1946, early in its history converted to "the Pioneertown Soundstage," is a rectangular-plan, two story commercial building/soundstage with a front-gabled monitor roof. Front and side elevations are wood board and batten, and the rear elevation is clad in corrugated metal. Wood cornerboards are part of the design.

The Pioneertown Gazette is a single story, rectangular plan stage set and commercial building, with a false front parapet and shed roof.

Parking calculations for the Project site have taken into consideration several Pioneertown conditions:

1. The site has been utilized for commercial / retail uses for many years and therefore could be subject to the following general parking provisions of § 83.11.030 General Parking Provisions.
   (c) Increase in Use. When the occupancy or use of a premises is altered, enlarged, expanded, or intensified, additional parking to meet the requirements of this Chapter shall be provided for the enlarged, expanded, altered, or intensified portion only.
2. Pioneertown is a 'walkable' Western Themed community with Mane Street providing a friendly pedestrian corridor stretching between Curtis Road west past Roy Rogers Road. As such, vehicles are greatly restricted with visitors navigating a host of parking areas provided by the various businesses located along Mane Street.
3. The Pioneertown Land Company (Applicant) has agreements in place for additional parking. As Pioneertown is a walkable community, visitors may park at one location and are likely to walk from the venue that they first park at to other locations within Pioneertown as the whole of the center of town spans a length (E/W) of about 1/3 of a mile.
4. As Pioneertown hosts a variety of local community events (list them here), business owners regularly band together to provide and manage the demands of such events. There are also adjacent properties/businesses located adjacent to Mane Street where parking occurs to absorb and manage demands. Larger community events and business activities also implement parking management practices, signage, security services and personnel to increase efficiency and safety.

The current parking assigned to the Project Site is as follows:

Soundstage 6,223 SF at 250 SF/ space =	25 spaces
Gazette 831 SF at 250 SF / space =	3 spaces
	28 total

Occupancy threshold for the existing buildings / uses is as follows:

Soundstage	300
Gazette	25

Outdoor Pavilion 50
375 total
Seating threshold for interior / exterior:
Soundstage 75
Gazette 25
Outdoor Pavillion 35
135 total

ADA and Loading parking spaces have been calculated based upon the total parking count depicted in the Project Site Plan.
51 standard parking spaces
4 standard ADA
1 Van ADA
1 Loading

Based upon the proposed Project design and ability to add and enhance existing parking availability it can be determined:

- **Consistency:** The site for the proposed use is adequate in size and shape to accommodate the use and all yards, walls, fences, parking, loading, and landscaping.
- **Compatibility:** The site has adequate access to streets and highways designed to carry the traffic generated by the proposed use.
- **Infrastructure:** The proposed use will not adversely affect the General Plan, any applicable community plan, or the surrounding area, ensuring it is compatible with existing uses.
- **Health and Safety:** The proposed use will not be materially detrimental to the public health, safety, or welfare of the county.
- **Site Suitability:** The proposed use is allowed by a CUP in the land use zoning district.

2-2 The comment conveys concern that the current use of the facility has not been legally established. The historic use of the site is not considered an "illegal" use by the County, but the proposed improvements would require a Conditional Use Permit (CUP) from the County. As stated in the IS/MND, events held at the Pioneertown Soundstage would be permitted under its proposed CUP.

2-3 The comment conveys that the events held at the Soundstage are currently unpermitted and requests establishment of a basis for which the County is considering the Soundstage an existing use for the purposes of this Application. The Silver Dollar constructed in 1946, early in its history converted to "the Pioneertown Soundstage." Events and other activities have occurred at this site location for many years.

A list of ongoing activities occurring on-site and throughout the Mane Street corridor:

- John Wayne Charity Run
- Pioneertown Days
- Pioneertown Christmas events
- SB County Sheriffs Association Gala
- APA Workshop's
- Community Outreach events
- Open throughout the year as a visitor 'rest stop'
- Local non-profit events and symposiums
- Private events and ceremonies

Pioneertown is a 'walkable' Western Themed community with Mane Street providing a friendly pedestrian corridor stretching between Curtis Road west past Roy Rogers Road. As such, vehicles are greatly restricted with visitors navigating a host of parking areas provided by the various businesses

located along Mane Street and an array of parking areas scattered behind and adjacent to the western themed ‘old town’.

The Pioneertown Land Company (the Applicant) has agreements in place for additional parking, and further, as discussed under response to comment 2-3, Pioneertown is a walkable community, meaning that visitors may park at one location and are likely to walk from the venue that they first park at to other locations within Pioneertown, as the whole of the center of town spans a length (E/W) of about 1/3 of a mile.

As Pioneertown hosts a variety of local community events, business owners regularly ‘band together’ to provide and manage the demands of such events. There are also adjacent properties / businesses located adjacent to Mane Street where parking occurs to absorb and manage demands. Larger community events and business activities also implement parking management practices, signage, security services and personnel to increase efficiency and safety.

2-4 This comment conveys that parking and traffic are major concerns in Pioneertown, and states that these issues have been exacerbated by the uses owned and operated by the Pioneertown Land Company. Please refer to response to comments 2-1 and 6-3, which address the parking concerns raised in this comment. Further, refer to response to comment 6-2, which addresses the traffic concerns raised in this comment. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #3
Kerrie Aleu

3-1 The comment asks whether the Soundstage drawings and operational plans will be revised. The plans and operations analyzed and presented in the IS/MND are not anticipated to materially or substantially change.

3-2 The comment conveys concern that the current use of the facility has not been legally established. The historic use of the site is not considered an "illegal" use by the County, but the proposed improvements would require a Conditional Use Permit (CUP) from the County.

The County does not plan on extending the comment period for the proposed Project. However, any comments received after the conclusion of the comment period on March 16, 2026 would remain a part of the record for review by County decision-makers.

3-3 The comment notes that the commenter would be agreeable to meeting with the Project applicant to discuss the Project. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #4
Mojave Desert Air Quality Management District

4-1 This comment is introductory in nature and describes the proposed Project. The commenter's description of the Project is accurate.

4-2 This comment notes that the District requires fugitive dust best management practices (BMPs) be implemented. As discussed in the IS/MND under Air Quality, the proposed Project will implement Fugitive Dust BMPs through the implementation of **MMs AQ-1 through AQ-6.**

The District also requires permits for miscellaneous process equipment that is not exempt under Rule 219. No permits are anticipated to be required to operate the proposed Project.

The District also notes that an asbestos survey is required for demolition or renovation of existing buildings. The Developer will adhere to this requirement, where necessary, for renovation of on-site structures. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

4-3 This is a conclusory comment. The contact information provided herein will be retained in the Project file.

RESPONSE TO COMMENT
LETTER #5
Colorado River Basin Regional Water Quality Control Board

5-1 This comment is introductory in nature, and provides contact information for the County or Developer to follow up with any questions. The contact information provided herein will be retained in the Project file.

RESPONSE TO COMMENT
LETTER #5
Colorado River Basin Regional Water Quality Control Board

5-2 This comment indicates that the Project may require development of an SWPPP and NPDES. As stated on page 12 of the IS/MND, the Project would not result in the disturbance of more than one acre of soil/land during construction. Thus, no Storm Water Pollution Prevention Plan (SWPPP) or Water Quality Management Plan (WQMP) are required.

RESPONSE TO COMMENT
LETTER #5
Colorado River Basin Regional Water Quality Control Board

5-3 This comment indicates that the Project may contain features regulated by the Regional Board. The proposed Project will ensure compliance with the Basin Plan to avoid any violation of water quality objectives as discussed under Subchapter X, Hydrology in the IS/MND.

5-4 This comment again asks whether the Project is subject to an SWPPP or NPDES due to its size, and as stated under response to comment 5-1, the proposed Project would not be subject to these requirements due to the proposed disturbance of less than one acre. The Applicant shall require that the construction contractor to implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters through the implementation of **MM HYD-1**. These responses to comments correct the minor error on page 91 stating that compliance with the Construction General Permit (CGP) and SWPPP would be required, as instead, this statement should be revised to state "compliance with the Construction General Permit (CGP) and SWPPP would be required, if applicable."

The comment also provides a link to the Basin Plan, which will be retained in the Project file.

RESPONSE TO COMMENT
LETTER #6
Anonymous (Concerned Resident)

6-1 The comment expresses that the commenter does not approve of the proposed Project. The commenter does not express any issue that is specific to the CEQA review for this Project, and as a result, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

6-2 This comment conveys concern that the Project will increase traffic, noise, trash, and crime, but provides no context for the specific reason that this Project would cause these issues.

Solid Waste must be handled in accordance with existing County and State regulations. Further, MDAQMD Rule 402 requires solid waste to be handled in covered containers and removed at regular intervals in compliance with the solid waste regulations. As analyzed under issue XIX, Utilities and Service Systems (d) and (e), for which the IS/MND identified less than significant impacts.

The issue of sheriff services are discussed under issue XV, Public Services (b), wherein the IS/MND determined that the proposed Pioneertown Soundstage Project is anticipated to create a minimal demand for law enforcement protection services based on the type of uses and the general lack of activities that would substantially increase demand for such services, particularly as the proposed Project would merely expand the existing use rather than creating an entirely new use creating an entirely new demand for police protection services. No unique circumstances that would result in any unique or more extensive crime problems that cannot be handled with the existing level of police resources were identified. Impacts were determined to be less than significant.

The issue of Noise was analyzed in a Project-specific noise study (**Appendix 5**). The Noise Study (Appendix 5) evaluated the projected Project noise and compared it to the existing condition and Development Code noise standards. Table XIII-4 of the IS/MND outlines the reference noise levels used to calibrate the models. Potential solutions to reduce the noise impact to adjacent residences were compared using these reference sound levels as a baseline condition and evaluated based on the noise level projections as shown in Exhibit XIII-2 from the IS/MND. Receptor 1 represents the commercially zoned bar to the west. Receptor 2 represents the commercially zoned bowling alley to the east. Receptor 3 represents the unoccupied residentially zoned land to the south. Further south of receptor 3 is an occupied residential property. Receptor 4 represents the commercially zoned motel to the northeast. Receptor 5 represents the commercially zoned church to the northwest. All projected noise levels meet the County code for daytime and nighttime noise limits. The commercial noise level is the loudest just east of the soundstage doors, up to 59 dBA L_{eq} during day and night hours. The residentially zoned properties will be up to 46 dBA L_{eq} during the day and 45 dBA L_{eq} at night. Thus, operational noise was modeled to be less than significant.

Further, construction noise was determined to be less than significant because, at 180 feet from the sources (the nearest sensitive receptor property line is approximately 180 feet south of the Project's southern boundary) the loudest potential construction source (88 dBA) would attenuate to 76.87 dBA at the nearest sensitive receptor property line. Thus, noise impacts were determined to be less than significant through the implementation of mitigation measures intended to further reduce construction noise impacts.

The issue of traffic was analyzed in a Project-specific TSA (**Appendix 6**). The conclusions in the IS/MND found under issue XVII, Transportation, (a), are as follows "The proposed project satisfies the County-established level of service (LOS) screening criteria for projects generating fewer than 50 peak hour trips. Therefore, the project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established LOS screening criteria. Thus, the proposed project would

have a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including roadway facilities." Further, the proposed Project would not generate significant VMT impacts because the Project meets the Project Type Screening because it is a local serving retail use less than 50,000 SF in size per the County Guidelines and meets the Low VMT Area Screening Criteria by way of the use of the SBCTA VMT Screening Tool.

6-3 The comment asks about whether the Project would increase parking, and notes that Mane Street is a private street that does not provide public parking. As described on page 4 of the IS/MND, the parking on-site includes 50 automobile parking spaces, which includes 5 accessible (American Disabilities Act [ADA]) parking spaces that would be paved, and 1 loading space. The Project does not propose utilizing parking along Mane Street as this comment suggests. Refer to response to comment 2-1, which elaborates on the Project parking.

6-4 The comment asks whether the Developer would provide any security. No security is planned at this time, as none has been identified as necessary to support the on-site use. Refer to response to comment 6-2, above, which addresses the commenters concerns related to "crime." Without further information indicating why security would be necessary, this comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

6-5 The comment requests that the County decisionmakers not approve the Project. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #7
Curt Sautter

7-1 The comment conveys that the commenter believes that the Project is not compatible with the rural desert community setting of Pioneertown, and that the IS/MND does not fully disclose impacts thereof. First, please review the discussion under Land Use and Planning (Subsection XI of the IS/MND), which addresses the Project's compatibility with the underlying land use of the Project site (Commercial). Further, the County directs the commenter to these Responses to Comments, which supplement the Final IS/MND and address comments raised on the Project during the Public Review period. The whole of the record reflects a full substantiated CEQA document, as demonstrated herein and in the Final IS/MND.

7-2 The existing and proposed use are intended to provided continued use for the community and to augment the expansion of uses occurring in Pioneertown presently and into the future; e.g. Pioneertown Motel Expansion, Red Dog patio expansion. The addition of an outdoor covered patio area, the Pioneertown Gazette building and bathrooms are meant to provide amenities that are currently limited or lacking for the use by visitors already in Pioneertown.

7-3 The comment pertains to the noise study, and the commenter's belief that it does not fully address the potential noise impacts. The County directs the commenter to responses to comments 7-4 through 7-6, which address the commenters concerns related to noise, and provide further explanation related to the rational for the model used in the Noise Study.

RESPONSE TO COMMENT
LETTER #7
Curt Sautter

7-4 The noise study assumes a conservative nighttime noise level of 38 dBA Leq, which aligns with the Countywide Plan traffic noise contours. The noise 60 CNEL contour is at 25 feet from the centerline. The receptors are up to 380 feet from the centerline, meaning the CNEL noise level at receptors 4 and 5 would be 48 dBA. As the nighttime noise level is typically 10 dB less than the CNEL, a 38 dBA Leq nighttime noise level is supported by the Countywide Plan. Additionally, a lower or higher ambient noise reading would not change the conclusion that the Project noise is below the County limits at the surrounding uses.

7-5 The entire 45 dBA daytime contour is visible in Figure 4 of the Noise Study. All listed residential homes are outside of the 45 dBA contour for both nighttime and daytime operations and therefore below the County noise limits for residential uses. Therefore, the impact to these residences is less than significant.

The model does include topography 1,500+ feet from the Project site. Beyond that, the noise level is so insignificant (< 10 dB) that the model no longer processes topography interactions.

RESPONSE TO COMMENT
LETTER #7
Curt Sautter

7-6 SoundPLAN assumptions are based on published, verified, and vetted real-world measurements.

The soundstage reference is “Night club, dance café with very loud music”, Praxisleitfaden Gastgewerbe, Forum Schall, Wien 2008 (with an added 2 dB buffer). The model assumes a worst-case scenario of an omnidirectional source on the stage that has a direct line of sight to the open door, and whose reflection from the back wall also has a direct line of sight to the open door.

The outdoor dining area reference is “Beer garden, normal”, Probst, W.: "Geräuschentwicklung von Sportanlagen und deren Quantifizierung für immissionsschutzgerechte Prognosen", Bundesanstalt für Sportwissenschaft, 1994. This model is based on the square footage of a typical outdoor seating area and assumes conservatively that 50% of people within that area are speaking at the same time.

The soundstage (with the doors open), parking lot, and transformer noise are assumed to be at maximum operation for nighttime hours and still comply with the County limits.

RESPONSE TO COMMENT
LETTER #7
Curt Sautter

7-7 Please refer back to response to comment 2-1, which addresses parking.

In response to parking related noise, the parking lot noise assumes that every parking spot is occupied and that all cars are arriving or leaving at the same time. Thus, the noise model fully captures the concerns relayed in this comment.

7-8 The proposed Project would be subject to review and approval by the County to ensure conformance with County Standards are met. The County has determined that the Project meets the site circulation requirements, and allows for unpaved parking, specifically in rural areas where most parking lots are not paved. Pioneertown supports a number of venues that provide unpaved parking, and as such the proposed Project would conform to that which is currently provided within the community. Further, while the commenter claims that the Project is incompatible with the community, there are similar venues that have served the community for years. Further, as noted under response to comment 7-2, the existing and proposed use are intended to provided continued use for the community and to augment the expansion of uses occurring in Pioneertown presently and into the future. The main influx of visitors to Pioneertown, other than seasonal special events, filming and charity venues are drawn by Pappy & Harriett's entertainment events which are held between 5:30 PM and 10:00 PM. The 'spill-over' from pre-event and post-event will be captured by existing and newly approved facilities such as the Pioneertown Motel Project, The Soundstage, the Red Dog and nearby camping, Air B&B and others, some operating from 7 a.m. to midnight, the motel facility will be open to guests and staffed 24 hours a day, seven days a week.

RESPONSE TO COMMENT
LETTER #7
Curt Sautter

7-9 The comment claims that dust would be an adverse impact associated with the Project. The Project will be required to implement dust control in compliance with the Mojave Desert Air Quality Management District (MDAQMD), which mandates actions to prevent, reduce, or mitigate fugitive dust. Compliance with this mandatory regulatory requirement is deemed sufficient to ensure dust impacts are minimized to a level of less than significant.

7-10 The comment conveys concern that the IS/MND has piecemealed the Project, and has not analyzed the whole of the action. Specifically, the commenter mentions residences to the north and west, noise study deficiencies, parking deficiency, and the late-night operation of the Project. The IS/MND, bolstered by the expanded analysis contained in these responses to comments addresses noise deficiencies raised by this commenter in responses to comments 7-4 through 7-7. Response to comment 7-8 addresses the operations of the Pioneertown Soundstage as an event venue, and the County has fully addressed these impacts resulting from Project operations as described in the IS/MND. Parking is addressed under responses to comments 2-1 and 2-3. Note that the surrounding setting described in Table 1 acknowledges residential uses in the vicinity of the Project, but is intended to provide a description of adjacent land uses. As noted by the commenter, there are residences that exist throughout Pioneertown, and are considered when determining the Project impacts where appropriate. For instance, for CEQA purposes, generally the residences closest to the Project site are considered when looking at sensitive receptors for Air Quality or Noise purposes, because the closest sensitive receptors would have the potential to receive the greatest impacts from a given action. Thus, those residences located farther afield would be expected to experience less, for instance, noise impacts than the closest sensitive receptor because it would be located at a greater distance, allowing noise to attenuate to a lower level that that which would occur at the nearest sensitive receptor. Thus, the analysis does not omit impacts to the residences located in Pioneertown as a whole, as suggested in this comment. The County contends that the Project as described in the IS/MND and herein, has been analyzed as a whole.

7-11 Please refer to the responses to comments provided for the previous comments in this comment letter, as they address the concerns raised in this comment.

7-12 The comment conveys that the commenters concerns raised throughout this comment letter, and as stated under response to comment 7-11, please refer to the responses to comments provided for the previous comments in this comment letter, as they address the concerns raised in this comment.

RESPONSE TO COMMENT
LETTER #7
Curt Sautter

7-13 The comment summarizes concerns raised throughout this comment letter, and as stated under response to comment 7-11, please refer to the responses to comments provided for the previous comments in this comment letter, as they address the concerns raised in this comment.

7-14 The comment is conclusory in nature. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-1 The comment is introductory in nature. The remainder of the forthcoming responses to comments address the introductory concerns raised in this comment. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

8-2 The comment suggests that the whole of an action must be considered under CEQA, and notes that the Project is believed to be part of a larger vision by the Applicant, thus rendering the consideration of this Project as singular, invalid. The Applicant provided certain materials to the County during a pre-application review that depicted certain aspects of Pioneertown Land Company properties and their uses. Following discussions with County staff the Project as currently proposed is limited to the Soundstage, Gazette, Patio Structure and addition of restrooms. All other information not pertaining to the submitted Project is for reference to Pioneertown current activities. Thus, as the Project does not depend on other actions in order for it to be viable, it has independent utility and the consideration of the Project, as defined in coordination with the County, consists of the whole of an action.

8-3 The comment contends that the available parking to the public, at present, includes several parcels, including the subject parcel. The parking within privately owned parcels does not constitute public parking, and further Pioneertown is a walkable community. Other uses along Mane Street are not being considered with the Project application. Parking concerns are discussed further under responses to comments 2-1 and 2-3.

The events held at the subject parcel are discussed further under response to comment 2-3. Further, the concerns related to unpermitted events are under the purview of Code Enforcement, and do not have bearing on the Project moving through the County's Development Application process. Refer to *Riverwatch v. County of San Diego*,[3] which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities.

8-4 Please refer to responses to comments 8-2, and 8-3, which address the Applicant's pre-application materials in relationship to the Project that is proposed as found in the IS/MND, and in relationship to Code Enforcement. Refer to *Riverwatch v. County of San Diego*, which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities.

[3] https://www.casemine.com/judgement/us/627e1acf714d585d57cb659f

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-5 Please refer to response to comment 8-2 which addresses the Applicant's pre-application materials in relationship to the Project that is proposed as found in the IS/MND.

8-6 Please refer to response to comment 8-2 which addresses the Applicant's pre-application materials in relationship to the Project that is proposed as found in the IS/MND.

8-7 Please refer to response to comment 8-2 which addresses the Applicant's pre-application materials in relationship to the Project that is proposed as found in the IS/MND.

8-8 Please refer to response to comment 8-3 which addresses the which addresses the Applicant's pre-application materials in relationship to Code Enforcement. Please refer to response to comment 2-3, which addresses the events held at the Project site. The events at the Soundstage are not considered new, as, in discussion with the County, it was concluded that the traffic evaluation should focus on new uses of the site.

The Project Transportation Screening Assessment (TSA) screened for both level of service (LOS) analysis and vehicle miles traveled (VMT) analysis using the established criteria as specified in the County of San Bernardino Transportation Impact Study Guidelines, July 2019 ["County TIA Guidelines"]. The County TIA Guidelines also stipitate the method of trip generation forecasts. The Project TSA was reviewed by the County in November 2024 and Peer Reviewed in October 2025. The Project TSA listed existing buildings to be remodeled with existing land uses and new proposed land uses. The trip generation forecast takes into account new land uses with credit for the retired land use at the Pioneertown Soundstage.

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-9 Please refer to response to comment 7-8, which addresses the site's use in relationship to existing site uses. The demand of the coffee/ice cream shop and food cart would not draw trips from outside the local area, so are primarily anticipated to serve visitors that will already be in the area and capture trips generated by the existing primary on-site uses such as the Soundstage and nearby uses such as Camp Pioneertown and Pioneertown Motel.

8-10 The allowed occupancy of the site will be driven by the Conditional Use Permit for which the Applicant has applied, which will establish the maximum persons allowed on-site at any given time. Further, the outdoor dining area may be 3,024 SF, but the amount of persons supported on-site will be dictated by the availability of seating, which shall be established in accordance with the Project's CUP. Thus, the Project must operate within the parameters of its CUP and if it violates those terms, the consequences are addressed by County Code Enforcement.

8-11 The NOC states that there would be 40 employees. The NOC form does not specify whether the employees are part-time or full time. There are 40 part-time employees, with 10 full-time employees planned to be supported by the full Project operation, as described in the Project Description within the IS/MND. The NOC form selected 40 as the number of part time employees, but is corrected by this record to reflect that the number of employees found in the IS/MND Project Description is accurate. Further, the Air Quality and Greenhouse Gas Impact Assessment utilized 10 full time employees and 10 part time employees in its consistency analysis related to greenhouse gas (GHG). This was a simple error that has since been revised as part of the Final IS/MND, and the revised report is included as an Attachment to these responses to comments, and further, the updated data is presented in an Errata found at the end of these responses to comments. The Errata summarizes supplemental and updated information regarding the analysis contained in the IS/MND for the Pioneertown Soundstage Project. This information is provided to further reflect a good faith effort at full disclosure and provide the public, including the decision makers, with the most up-to-date and specific information known regarding the anticipated impacts which may result from the Project. This correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Section 15073.5.

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-12 The use of 12,449 SF in the NOC included the impervious area developed in association with the ADA parking. As discussed under response to comment 8-11, an Errata to the IS/MND is found at the end of these responses to comments. The Errata summarizes supplemental and updated information regarding the analysis contained in the IS/MND for the Pioneertown Soundstage Project. This information is provided to further reflect a good faith effort at full disclosure and provide the public, including the decision makers, with the most up-to-date and specific information known regarding the anticipated impacts which may result from the Project. These corrections do not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Section 15073.5.

8-13 The comment refers to the description of the Project on page 1 of the Biological Resources Assessment (BRA). The description found therein describes the Project as being located on 1.84 acres, and is simply noting that the event and community gathering space and hospitality Project consist of 10,377 SF. The site plan as currently proposed shows the Soundstage (6,223 SF) and its enclosed Outdoor Patio (3,258 SF), Pioneertown Gazette (831 SF), Mobile Kitchen Trailer (225 SF), Restroom Trailer (250 SF), Mobile Snack Cart (aka Mini Horse Kiosk 145 SF), Outdoor Dining Pavillion (3,024 SF), and ADA Parking (1,976 SF). This is consistent with that which was analyzed in the IS/MND and its technical appendices. Regardless, the intent in the BRA was not to insinuate the biological resource impacts would only occur within a small portion of the 1.84 acre site, it was to provide a simple description of the specific purpose of the Project (as an event and community gathering space and hospitality Project). The use of 10,377 SF was a simple error that has since been revised and simplified as part of the Final IS/MND, and the revised report is included as an Attachment to these responses to comments, and further, the updated BRA is presented in an Errata found at the end of these responses to comments, as described under response to comment 8-11. This correction does not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Section 15073.5.

8-14 The Air Quality and Greenhouse Gas Assessment (AQ/GHG Assessment) each provide an explanation for the timeline of construction that negates the need for perfect syncing with the actual schedule, as frequently studies are conducted in advance of the Project approval, with ambitious schedules that may require revision pending the Project moving through the County's development application process. The description found in the AQ/GHG Assessment and IS/MND is as follows:

> For purposes of analysis, construction of the Project is expected to commence in October 2025 and would last through December 2026. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[4] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*.

8-15 The noise study assumes a conservative nighttime noise level of 38 dBA Leq, which aligns with the Countywide Plan traffic noise contours. The noise 60 CNEL contour is at 25 feet from the centerline. The receptors are up to 380 feet from the centerline, meaning the CNEL noise level at receptors 4 and 5 would be 48 dBA. As the nighttime noise level is typically 10 dB less than the CNEL, a 38 dBA Leq

[4] As shown in the CalEEMod User's Guide Version 2022, Appendix G "Table G-11. Statewide Average Annual Offroad Equipment Emission Factors" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

nighttime noise level is supported by the Countywide Plan. Additionally, a lower or higher ambient noise reading would not change the conclusion that the Project noise is below the County limits at the surrounding uses.

8-16 The commenter contends that there are differences across the site plans shown in the technical studies. A review of each of the technical studies published for the Project confirms that the site plans utilized in the applicable studies each show the Project as it is proposed. Thus, without the commenter pointing to a specific variation, the County cannot provide further comment on this matter.

8-17 The BRA's intended focus is not to forensically look at what species existed on the site historically, but instead to focus on what special status species exist on the site or could be supported by the Project site. The allegation that the applicant removed a Joshua Tree is not a CEQA issue. The agency governing protection of Western Joshua trees is the California Department of Fish and Wildlife (CDFW), and this is a matter that would be handled under their purview. While the County protects this species pursuant to Section 88.01.060 of the San Bernardino County Development Code, this issue is a Code Enforcement issue, not a CEQA issue as the tree died and was removed prior to the Applicant's development application with the County. Refer to *Riverwatch v. County of San Diego*, which concluded that CEQA is not to be used as enforcement for violation of other environmental laws. In any case, the addition of native landscaping in the Project area is included as part of the Project; the County could require or suggest that the Applicant to plant another Western Joshua tree at or near the previous location. In conclusion, the BRA addresses impacts to existing Western Joshua trees that occur and could be impacted by the proposed Project, and further, mitigation was addressed in the form of **MMs BIO-1 through BIO-3**, to minimize potential impacts to this species.

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-18 The rehabilitation of the Pioneertown Gazette was performed due to neglect, infestation and unsafe conditions. The evaluation of the Pioneertown Gazette was based on current conditions of this National Register property at the time of the study. As previously stated, this evaluation focuses on the impacts of implementing the proposed Project as presented at the time that the Applicant submitted an application. Previous alterations and changes to the Pioneertown Gazette over time, such window replacements on other buildings, or the changes in the 2025 appearance of the Pioneertown Gazette compared to its 2019 appearance when nominated for the National Register are noted and considered in terms of their impact on the historical integrity of this National Register property and whether the property continued to retained sufficient integrity to maintain its National Register eligibility, which in regards to the Pioneertown Gazette, it did. Thus, the findings in CRM TECH's Historic Building Study and CEQA-Compliance Analysis (**Appendix 3b**) remain valid, and encompass the Project's impacts on historical resources, as mitigated through the implementation of **MM CUL-1**.

8-19 San Bernardino County Development Code 82.19.040 pertains to Development Criteria within Scenic Areas that must occur within an Open Space Overlay. The proposed Project does not occur within an Open Space Overlay, thus, these standards do not apply to the Project. The shade, picnic tables, modular kitchen, etc., planned for in between the two buildings are not fixed permanent features and will not directly impact either building. The patio addition and enclosure at the rear of the Soundstage also will be removable and out of the primary viewshed, though visible from the Pioneertown highway outside the historic district boundary. Thus, these additions do not constitute permanent features that would impact the historical features existing on-site.

Finally, the discussion of impacts to historic resources within a scenic highway are discussed under Subchapter I, Aesthetics, issue (b).

8-20 Please refer to response to comment 8-19, above, which addresses the not fixed permanent features proposed as part of the Project, and their impact on historical resources on-site. Building elevations will be provided to the County in advance of its consideration by the County decisionmakers, as required. However, the presentation of building elevations is not a requirement in order to comply with CEQA, and is not necessary to forecast Project impacts, as the site plan provides sufficient details therein.

8-21 The noise study focuses on the changes to the Project site as outlined by the Project description. There are no proposed changes to the outdoor patio area south of the Soundstage.

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-22 The current use of the Pioneertown Gazette, which has not served as a residence for years due to the fact that it became uninhabitable due the state of disrepair the structure had become. Further, the County's Housing Element indicates that the County encourages the disuse or demolition of substandard housing, and the proposed Project would instead convert the proposed Pioneertown Gazette back to a commercial use as it was originally envisioned. The Project site itself has been designated for Commercial use by the Countywide Plan, and further, the proposed use of the site (inclusive of the Soundstage) is conditionally allowed under the Rural Commercial zoning classification and SD-RES zoning district. The Initial Study Checklist asks whether the proposed Project would displace substantial number of persons or housing, necessitating the construction of replacement housing elsewhere. While the Pioneertown Gazette formerly served as housing during its history, it first was established as a commercial use, and does not currently support housing. Thus, the proposed Project would not displace substantial persons, as none reside within the site, and would not displace substantial housing, as none is currently supported on-site, thus, as concluded in the IS/MND, the proposed Project would have no impacts under this issue.

Additionally, the remaining uses discussed in this comment are not a part of this Project. The Pioneertown Gazette is discussed above, and it is the only mentioned use that is located within the bounds of the Project site.

8-23 The single family residence proposed to be located adjacent to the Project site has been determined to be speculative as it is not built at this time, and that, in terms of noise evaluation, it should not be evaluated as a sensitive residential receptor at this time.

8-24 The outdoor patio behind Soundstage is not intended to increase capacity of occupants at the Soundstage, but instead, is intended to offer (when accessible) an outdoor area versus visitors being confined indoors only. Further, the Project's Conditional Use Permit (CUP) would dictate the operational limits within which the Project is allowed to operate. Once operational, violation of these terms would be handled by County Code Enforcement. Refer to *Riverwatch v. County of San Diego*, which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities. Further, the number of persons that would utilize, for instance, the Outdoor Dining Pavilion, would be limited by the number of seats provided therein.

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-25 CEQA has established that the baseline by which Project impacts are measured against reflect actual existing physical conditions at the start of environmental review (ex: *Wal-Mart Stores, Inc. v. City of Turlock)*.[5] Further, as previously stated, refer to *Riverwatch v. County of San Diego*, which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities. Thus, the analysis contained in the IS/MND constitutes an analysis of the Project against existing conditions as described therein. Further, the discussion of the Pioneertown Gazette and its former use can be found under response to comment 8-22, above. The establishment of the current and past events held at the Pioneertown Soundstage is found under response to comment 2-3. Further, the single family residence issue, and discussion of permitted versus non permitted uses is found under response to comment 8-22, as well.

8-26 The County reviews the site plans for the proposed Project, and must review them against the Development Code. As the commenter is aware, site plans are refined over time as part of the Development Application process, and are typically finalized prior to consideration for approval by the County.

8-27 The County reviews the site plans for the proposed Project, and must review them against the Development Code. The Project will be required to comply with the Development Code, wherever feasible, and prior to the consideration of the Project by the County, the site plan will be updated to reflect compliance thereof.

[5] https://www.casemine.com/judgement/us/5914b459add7b0493476bc7f

RESPONSE TO COMMENT
LETTER #8
Ben Loescher

8-28 This comment relates to the sizing of wastewater, but doesn't explain why it would be undersized. The Percolation Testing for Onsite Sewage Disposal Feasibility and Geotechnical Reports by Sladden Engineering 12/18/2024 and 2/11/2026 determined that the Project is anticipated to be feasible from a geotechnical perspective provided that the recommendations included in the report are incorporated into design and carried out through construction, which is required by the County. The main geotechnical concerns are the presence of loose and potentially compressible near-surface native soil throughout the Project site. Further, based on the data presented and the tested information accumulated, it is the judgment of the engineer that the groundwater table should not encroach with the allowable limit set forth by County and State requirements, when the recommendations are followed. Also, there appears to be sufficient area for the proposed on-site sewage disposal systems and future expansion. Further, as stated under Subchapter VII, Geology and Soils, issue (e), the new septic tank system will be capable of handling about 2,000 gallons of waste per day and will be developed in accordance with current California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards, which sets parameters for private sewage disposal, and in compliance with the County Development Code, Article 6. The septic system has been evaluated by professionals in their fields (Sladden Engineering), and have been determined to be sufficient to serve the proposed Project.

8-29 The comment is conclusory in nature. Thus, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #9
Nancy Olsen

9-1 Please review the discussion under Land Use and Planning (Subsection XI of the IS/MND), which addresses the Project's compatibility with the underlying land use of the Project site (Commercial). While the commenter notes that this Project is located within a rural desert community, it is a proposed use that supplements or compliments existing uses. The existing and proposed use are intended to provided continued use for the community and to augment the expansion of uses occurring in Pioneertown presently and into the future; e.g. Pioneertown Motel Expansion, Red Dog patio expansion. The addition of an outdoor covered patio area, the Pioneertown Gazette building and bathrooms are meant to provide amenities that are currently limited or lacking for the use by visitors already in Pioneertown. Further, while the commenter claims that the Project is incompatible with the community, there are similar venues that have served the community for years. The analysis acknowledges the existing conditions, and the County directs the commenter to these Responses to Comments, which supplement the Final IS/MND and address comments raised on the Project during the Public Review period. The environmental baseline is discussed under responses to comments 8- 3, 4, 24, and 25, and the County directs the commenter to these responses.

9-2 For clarification purposes, the record should reflect that the zoning district is SD-RES, the land use designation is Commercial, and the zoning classification is Rural Commercial. These are each different categories with separate identifications. Thus, the Project has been properly analyzed against these conditions. Note that the surrounding setting described in Table 1 acknowledges residential uses in the vicinity of the Project, but is intended to provide a description of adjacent land uses. As described under response to comment 7-10, there are residences that exist throughout Pioneertown, and are considered when determining the Project impacts where appropriate. For instance, for CEQA purposes, generally the residences closest to the Project site are considered when looking at sensitive receptors for Air Quality or Noise purposes, because the closest sensitive receptors would have the potential to receive the greatest impacts from a given action. Thus, those residences located farther afield would be expected to experience less, for instance, noise impacts than the closest sensitive receptor because it would be located at a greater distance, allowing noise to attenuate to a lower level that that which would occur at the nearest sensitive receptor. Thus, the analysis does not omit impacts to the residences located in Pioneertown as a whole.

Note that the site plan "notes" incorrectly state that the Zoning District is General Commercial, and this shall be corrected in the final Site Plan that will be considered by the County. The IS/MND and its technical studies utilize the description provided above (zoning district is SD-RES, the land use designation is Commercial, and the zoning classification is Rural Commercial) as a measure by which to analyze environmental impacts.

9-3 The noise study assumes a conservative nighttime noise level of 38 dBA Leq, which aligns with the Countywide Plan traffic noise contours. The noise 60 CNEL contour is at 25 feet from the centerline. The receptors are up to 380 feet from the centerline, meaning the CNEL noise level at receptors 4 and 5 would be 48 dBA. As the nighttime noise level is typically 10 dB less than the CNEL, a 38 dBA Leq nighttime noise level is supported by the Countywide Plan. Additionally, a lower or higher ambient noise reading would not change the conclusion that the Project noise is below the County limits at the surrounding uses.

There are no existing residential uses within the 45 dBA contour as shown in Figure 4 of the noise study. The County noise limits are based on how the adjacent parcels are currently used and not how they are zoned.

9-4 Please refer to response to comment 8-8, which addresses the concerns related to how the TSA was conducted. Note that a discussion of emergency access and evacuation are found under Subchapters IX, Hazards and Hazardous Materials, and XVII, Transportation.

RESPONSE TO COMMENT
LETTER #9
Nancy Olsen

9-5 Refer to responses to comments 2-1 and 2-3, which address the concerns related to parking found in the comment. Further, the issue of dust is addressed under response to comment 7-9. Please refer to responses to comments 7- 4, 5, 6, and 7 in relation to noise.

9-6 The comment conveys that the IS/MND acknowledges potentially significant impacts, but the commenter should note that each and every impact was determined to be no impact, less than significant, or less than significant through the implementation of mitigation. The comment is otherwise is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

9-7 The comment pertains to the historical value of the site, and the County directs the commenter to the responses to Comment Letter #10, which address the concerns raised in this comment.

9-8 The commenter addresses a number of concerns, without specific details provided related to each concern. However, each concern is addressed as part of the impact analysis found in the IS/MND and bolstered by these responses to comments. While the commenter notes that this Project is located within a rural desert community, it is not a proposed use that does not supplement or compliment existing uses, as described under response to comment 9-1, above.

9-9 The comment conveys opposition to the Project and is conclusory in nature. Thus, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-1 The comment is introductory in nature, and further notes that the 2024 comment letter should be considered by the County. The new portions of the 2024 comment letter are addressed in the responses below. Further, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

10-2 The comment states "Though I commend all three reports on acknowledging the need for any project to follow the Secretary of the Interior's Standards (SOI) for Rehabilitation, I'm not clear how these studies can conclude the project presents no impacts when these necessary materials for analysis do not seem to exist."

The BCR Technical Report conclusion was not that there would be "no impacts." The recommendation was adherence to SOI guidelines and that if designed and implemented in accordance with these recommendations and guidelines, the Project will not impose a substantial adverse change in the significance of the National Register property. This conclusion was supported by an analysis of the Project components, which indicates that the Project buildings will remain intact with no significant direct impacts to the buildings, and all of the Project components are reversible. In Mr. Paul's 2024 letter he offers some design and material suggestions to consider in finding common ground to move the Project forward.

10-3 The mitigation measures identified in the IS/MND were drawn from CRM TECH's Historic Building Study and CEQA-Compliance Analysis (Appendix 3b). The BCR Cultural Resources Assessment (Appendix 3a) was a Phase I level report, with the CRM TECH study focused on the specific historical impacts resulting from the proposed Project. Please refer to response to comment 10-2, above.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-4 In regard to the unpermitted changes including the Gazette boardwalk and Joshua tree removal: A new boardwalk is planned for the Gazette as part of its restoration and is mentioned in the report (p. 9). The allegation that the applicant killed a Joshua Tree is not a CEQA issue. The agency governing protection of Western Joshua trees is the California Department of Fish and Wildlife (CDFW), and this is a matter that would be handled under their purview. While the County protects this species pursuant to Section 88.01.060 of the San Bernardino County Development Code, this issue is a Code Enforcement issue, not a CEQA issue as the tree died and was removed prior to the Applicant's development application with the County. In any case, the addition of native landscaping in the Project area is included as part of the Project; the County could require or suggest that the Applicant to plant another Western Joshua tree at or near the previous location.

10-5 The Project area occupies a 1.84-acre portion of the 39-acre historical district and does not extend into the Mane Street corridor. The shade, picnic tables, modular kitchen, etc., planned for in between the two buildings are not fixed permanent features and will not directly impact either building. In his 2024 letter, Mr. Paul suggests for consideration a wider setback for the proposed sunshade and that the covering be canvas rather than wood, along with other ideas. The patio addition and enclosure at the rear of the Soundstage also will be removable and out of the primary viewshed, though visible from the Pioneertown highway outside the historic district boundary. Thus, these additions do not constitute permanent features that would impact the historical features existing on-site.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-6 The comment conveys the commenters opinions and opposition to the proposed Project without design improvements. Please refer to responses to comments 10- 2, 3, 4, and 5, above. Further, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-7 Mr. Paul's assertion is only part of Pioneertown's historical intent. When originally built it was also to serve as a fully functional, living town that could double as a movie location while supporting real residents and everyday life. In short, Pioneertown was a clever Hollywood experiment: a movie set engineered to evolve into (and sustain) a genuine desert community. It is not a preserved historic town from the 1800s—it's a remarkable 1940s recreation that became real life, and well-crafted changes and adaptive uses can be a vital part in sustaining its legacy.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-8 In regard to the Pioneertown Gazette, the building has since been restored based on historic photographs, virtually rescuing its integrity after conspicuous modern alteration had reduced its status as a district contributor only in "form and massing," as Mr. Paul states. So, once the wood decking in front is restored as currently proposed by the Project, the historic integrity of the Pioneer Gazette should be fully restored.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-9
&
10-10 (Hitching Post, sunshade, modular units): Mr. Paul raises objections to the proposed sunshade and whether the modular components actually would be “temporary.” The SOI standards are clear that both can meet the SOI standards if they are designed, sited, and installed as genuinely reversible additions with minimal impact on the National Register-listed historic district's character—especially under the key criteria of reversibility and compatibility.

The most applicable SOI standard for functional elements for ongoing use, and the national benchmark used for NR properties, is Standard 10: New additions...shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

This is called the reversibility requirement (detailed in Preservation Brief 14: New Exterior Additions to Historic Buildings). The standards do not distinguish "temporary" (short-duration with an expiration date) from "non-permanent" (removable design, potentially indefinite but easily taken away). What matters is the actual design and installation—not the label or the owner's long-term intent.

Modular units on skids, wheels, or minimal footings—with reversible utility connections (e.g., quick-disconnect plumbing/electrical that doesn't cut into historic fabric)—directly support this. National Park Service guidance and examples explicitly favor "non-permanent" or "reversible" treatments because they allow future removal and site restoration without damage.

That said, mobility does not bypass compatibility (Standard 9): The units must still be subordinate in scale/location (ideally rear/side, less prominent to the public view), visually differentiated (modern/modular appearance is fine if it doesn't mimic historic styles), compatible with the district's overall character and setting, and must not damage historic materials or require permanent alterations. These standards must be adhered to as part of Project implementation.

RESPONSE TO COMMENT
LETTER #10
Daniel D. Paul, Architectural Historian

10-11 The comment voices the opinion of the commenter that the County does not have an abundance of historic districts. This comment does not make any assertions or comments specific to this Project. Thus, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

10-12 The comment voices the opinion of the commenter that Pioneertown does not need saving. This comment does not make any assertions or comments specific to the IS/MND prepared for the Project. It should be noted that throughout these responses to comments, specifically to this comment letter, the adherence to SOI standards will be followed through as a requirement by the County, and by the Applicant as a requirement found in **MM CUL-1** found in the IS/MND as enforced by the County. Thus, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #11
Morongo Basin Conservation Association

11-1 The comment describes the Project as proposed. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

11-2 The comment is related to potential adoption of the "Pioneertown Overlay District," and notes that there has been no follow up from the County since a workshop was held months ago. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #11
Morongo Basin Conservation Association

11-3 First, it should be noted that the proposed Project has been described as an accessory, supporting or complimentary use to the existing uses found within Pioneertown, which include the existing use of the Soundstage for events. Activities occurring within Pioneertown are due to a number of factors attributed to existing commercial and community activities. Certain activities are 'seasonal' due to weather conditions, while others occur primarily during daylight hours while others occur after dark. The proposed Project will continue to provide use of the site and structures for specific events but also to accommodate the visitors to the area thar are already in Pioneertown for the day, weekend or otherwise. The main influx of visitors to Pioneertown, other than seasonal special events, filming and charity venues are drawn by Pappy & Harriett's entertainment events which are held between 5:30 PM and 10:00 PM (or sometimes even later). The 'spill-over' from pre-event and post-event will be captured by existing and newly approved facilities such as the Pioneertown Motel Project, The Soundstage, the Red Dog and nearby camping, Air B&B and others, some operating from 7 a.m. to midnight, the motel facility will be open to guests and staffed 24 hours a day, seven days a week.

As stated under response to comment 8-8, for instance, traffic has been analyzed utilizing the County's July 2019 TIA Guidelines. The County TIA Guidelines also stipitate the method of trip generation forecasts. Because the Soundstage is considered an existing use (see response to comment 2-3), the TSA evaluated the proposed new uses on-site, and it was determined that the proposed Project would satisfies the County-established level of service (LOS) screening criteria for projects generating fewer than 50 peak hour trips. Therefore, the Project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established LOS screening criteria. Thus, by the County's own thresholds, the LOS analysis, which evaluates cumulative traffic, is not warranted as the Project would not contribute enough peak hour trips to contribute meaningful cumulative traffic.

The noise evaluation reviews the impacts related to the Project's noise generation based on a baseline of the ambient noise environment. The proposed Project was evaluated to have a less than significant contribution to the cumulative noise environment. Please also refer to responses to comments 7- 4, 5, 6, and 7.

Septic evaluation is discussed under response to comment 8-28. Based on the nearly exclusive use of septic tanks or other alternative wastewater systems within the area (no municipal wastewater collection or treatment systems exist in the Project vicinity), the soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. This is further demonstrated by the Percolation Testing for Onsite Sewage Disposal Feasibility Report prepared by Sladden Engineering for the proposed Project. Groundwater was not encountered within the test holes/exploratory bores that extended to a maximum depth of approximately 40 feet below ground surface (bgs). Information regarding the approximate depth to groundwater provided by the California Department of Water Resources online database indicates that the depth to groundwater is in excess of 100 feet below the existing ground surface in the vicinity of the site. Further, the use of local groundwater water is limited due to naturally occurring uranium, arsenic, and fluoride.[6] Regardless, utilizing septic best management practices in conformance with the California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards would ensure that the use of septic within the site would not result in groundwater contamination.

Water is provided by San Bernardino County Department of Public Works Special Districts Water and Sanitation Division (District) as it is located within County Service Area 70 W4.11 The District obtains its water from the Mojave and Morongo groundwater basins. As of July 27, 2019, the water system now

[6] https://kbhr933.com/big-bear-news-kbhr-93-3-102-5/san-bernardino-county-brings-reliable-water-to-historic-pioneertown/

consists of one well and an emergency inter-tie to the Hi-Desert Water District's system and four water reservoirs with a combined capacity of 345,000 gallons (1.059 acre feet [AF]). Further, the proposed Project has been analyzed to not substantially increase demand. The current water use of the site is approximately 0.12 AF per year (AFY)(refer to Subchapter X, Hydrology and Water Quality, issue [b]), and is expected to increase only minimally by at most 10% with the implementation of the proposed Project. Existing water use and conservation measures are anticipated to cover the demand for water by the proposed site use. Thus, cumulative increase in water demand is presently captured by existing sources, and would remain less than significant.

The applicable continued development found in Pioneertown, specifically within the Historic Districts, would be required to meet the Secretary of the Interior (SOI) standards, thereby maintaining the visual resources found within the Historic District. The addition of the proposed Project would not modify the existing visual setting such that significant Project specific or cumulative effects would occur, especially given that SOI Standards would be met in accordance with **MM CUL-1.**

The County Development Code requires new projects to adhere to the provisions of the Chapter 83.07.060 Glare and Outdoor Lighting – Mountain and Desert Requirements. The Development Code requires that outdoor lighting meet shielding requirements, light pollution standards, automated control standards, dark sky curfew, and other requirements. While the proposed Project will generate a new source of lighting in support of the outdoor shade structure, the Project lighting will be consistent with that which exists on-site at the present because the Soundstage is an existing operational use that will be improved and expanded by the proposed Project. Thus, it is expected that through compliance with the Development Code, the Project's contribution to cumulative light pollution, light and glare impacts, etc., would be minimized to a level of less than significant. This is particularly the case as the proposed Project would reflect to continued and enhanced operation of an existing operational use that currently utilizes lighting for the same uses, including events (nighttime lighting) and standard hours of operation.

Finally, while the commenter notes that the Countywide Plan has predicted minimal growth within Pioneertown, the proposed Project would constitute the continued operation, with some expansion and improvement of an existing use that is complimentary to the Pioneertown Historic District found along Mane Street. The Project would aid in the continued improvements needed to maintain safety standards related to use of historic structures along Mane Street.

11-4 The comment concerns the availability of housing within the Project area. While Pioneertown is home to only hundreds of residents, the larger area is home to a greater population. For instance, according to the Countywide Plan nearby Yucca Valley is home to 25,848 persons. The proposed Project would create a potential for 10 more permanent opportunities for employment during operation, as well as up to 40 part-time employment positions to serve the operations during events or provide seasonal work as applicable, and 15 temporary opportunities for employment in support of Project construction. The analysis found under issue XIV, Population and Housing determined that if all new permanent employees were to be new residents of the County, the Project would represent only a less than 1% increase in population compared to the growth planned in the Countywide Plan. The same is true if temporary employees are included in this calculation. However, it is more likely that these positions would be filled by the existing populations in the surrounding area. For instance, the San Bernardino County Unemployment rate was 5% in December 2025 (most current data as of 04/06/26),[7] this would constitute approximately 1,292 persons utilizing the Yucca Valley population only. Thus, there is availability of workers that are already housed within the Project area that may be suited or interested in a position supported by the Project. Further, a review of Zillow indicates that within nearby Yucca Valley (about 3.5 miles from Pioneertown), there are presently approximately 56 rentals available, and

[7] https://fred.stlouisfed.org/series/CASANB1URN#:~:text=Bernardino%20County%2C%20CA-,Unemployment%20Rate%20in%20San%20Bernardino%20County%2C%20CA%20(CASANB1URN),Release%20Date:%20Apr%2016%2C%202026

165 units for sale,[8] thereby indicating that there is sufficient housing available within a reasonable commuting radius from the proposed Project to support employees, were they to move to the area to work at the Pioneertown Soundstage.

11-5 Please refer to response to comment 8-10, which addresses the concerns raised in this comment. Further, the use of the site and improvements shall be limited to events being held with the exception of public spaces. As visitors wander through Pioneertown public spaces, patios, boardwalks, porches will experience visitors as that which occurs at present. Although Mane Street is private property along certain areas, it lives as a pedestrian corridor for visitors to take advantage of once parked ae the east end of town and not having drive to experience the west end of town.

[8] Data gathered utilizing Zillow.com radius feature surrounding Yucca Valley on April 7, 2026.

RESPONSE TO COMMENT
LETTER #11
Morongo Basin Conservation Association

11-6 Finally, the discussion of impacts to historic resources within a scenic highway are discussed under Subchapter I, Aesthetics, issue (b). The Project area occupies a 1.84-acre portion of the 39-acre historic district and does not extend into the Mane Street corridor. The shade, picnic tables, modular kitchen, etc., planned for in between the two buildings are not fixed permanent features and will not directly impact either building. The patio addition and enclosure at the rear of the Soundstage also will be removable and out of the primary viewshed, though visible from the Pioneertown highway outside the historic district boundary. Thus, these additions do not constitute permanent features that would impact the historical features existing on-site. Please refer to responses to comment letter 10, which address that the Project will maintain the historical integrity of the site.

11-7 Please refer to responses to comment 2-1 and 2-3, which address parking related concerns.

11-8 As previously stated, the development of the proposed Project is inclusive of the existing Soundstage use. The Countywide Plan PEIR looked at the cumulative growth that may occur within the East Desert Region, which includes a growth from 2016 to 2040 of 12,184 employment positions, and 17,749 persons. It determined that, based on these metrics, the County would maintain sufficient services within its boundaries (PP 3-1) as well as expand to serve other incorporated jurisdictions to improve service and coverage. New and/or expanded fire stations in the unincorporated area would be subject to Countywide Plan policies protecting the environment, and new/expanded stations in both the unincorporated and incorporated areas would be subject to environmental review and mitigation pursuant to CEQA. Further, in regards to police protection services, New and/or expanded sheriff stations would be required to meet the increased demand for population and employment growth over the buildout of the Countywide Plan and to serve cities within the county. Development or expansion of sheriff stations would be subject to the myriad Countywide Plan policies designed to protect environmental resources and would also be subject to environmental review and impact mitigation per CEQA. Cumulative impacts associated with development of new stations are therefore determined to result in less than significant impacts. The proposed Project could represent only a fraction of the growth identified above, at 50 total employment positions, of which 40 are part-time, creating only a potential for only minor population growth. The proposed Project only represents 4% of the projected job growth in the region, which would not constitute a use that would generate significant new fire or police demand. Further, as the proposed use is intended to be complimentary to existing uses, the proposed Project is not anticipated to create a substantial new demand for fire protection services or police protection services. Please refer to the impact analysis found in Subchapter XV, Public Services (a and b) of the IS/MND.

11-9 Please refer to responses to comments 7-4, 5, 6, and 7, which address noise generated by the Project. Further, note that exceeding the thresholds of the County Development Code for operational uses is for consideration by Code Enforcement.

RESPONSE TO COMMENT
LETTER #11
Morongo Basin Conservation Association

11-10 All exterior lighting shall be installed in compliance with Dark Sky requirements, including existing light fixtures. Further, please refer to the response under response to comment 11-3, which addresses lighting in further detail.

11-11 Drainage and erosion are addressed under Subchapter X, Hydrology and Water Quality, issue c, as well as under Subchapter VII, Geology and Soils, issue b. These issues determined that the Project would manage drainage within the site and improvement the drainage management within the site compared to current conditions.

11-12 The Soundstage is an existing structure. Any new construction shall be conditioned to comply with applicable Codes. Further, please refer to responses to comment letter 10, which address that the Project will maintain the historical integrity of the site.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-1 The comment conveys that the commenter believes that the Project is not compatible with the rural desert community setting of Pioneertown, and that the IS/MND does not fully disclose impacts thereof. First, please review the discussion under Land Use and Planning (Subsection XI of the IS/MND), which addresses the Project's compatibility with the underlying land use of the Project site (Commercial). Further, the County directs the commenter to these Responses to Comments, which supplement the Final IS/MND and address comments raised on the Project during the Public Review period. The whole of the record reflects a full substantiated CEQA document, as demonstrated herein and in the Final IS/MND.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-2 Please refer to response to comment 8-12, which addresses the NOC Project tally. Further, note that the acreage of the site on the NOC form is intended to refer to the whole site acreage, while the SF is intended to be inclusive of building area. Also note that response to comment 8-11 addresses the NOC employee tally.

12-3 Please refer to responses to comments 8-2, 3, and 4, which address the Applicant's pre-application materials in relationship to the Project that is proposed as found in the IS/MND, and in relationship to Code Enforcement. Refer to *Riverwatch v. County of San Diego*, which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-4 The Project Application with the County is typically presented at a preliminary scale. The Final Site Plan often varies slightly from that which is included in the Initial application. The IS/MND considers the development under the current site plan, and analyzes the impacts thereof. Thus, the perceived inconsistency between the Project as presented in the IS/MND and the original Project Application materials is of no consequence to the validity of the Project plans as proposed so long as the materials are reviewed by the County and comply with the County Development Code standards, amongst other Codes (such as the CBC)

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-5 In regards to comment 4 herein, please refer to response to comment 12-4. In regards to comment 5, A lot merger would be a condition of approval, subject to the Project approval and issuance of building permits. Lot Mergers are ministerial actions subject to the County Development Code/Subdivision Map Act.

In regards to the NOA description of the Project, it matches the description found in the Project Description found in the IS/MND. The site plan found in the CEQA materials show and analyze the impacts of the restroom trailer and new septic system. Once again, the Project Notice from December 2023 is a preliminary County procedure that exists outside of the bounds of the CEQA process, and is rather a part of their planning process occurring in advance of consideration by the County decisionmakers. The NOA serves as a CEQA document that describes the Project as proposed in the IS/MND (CEQA document) as depicted in the Project Site Plan that has been refined over time between the Applicant and County Staff to ensure compliance with the County Development Standards.

12-6 The County can find no differences, other than perhaps spacing, between the CEQA NOA and the Summary Form.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-7 A lot merger would be a condition of approval, subject to the Project approval and issuance of building permits. Lot Mergers are ministerial actions subject to the County Development Code/Subdivision Map Act.

12-8 Please refer to response to comment 8-3 which addresses the which addresses the Applicant's pre-application materials in relationship to Code Enforcement. Please refer to response to comment 2-3, which addresses the events held at the Project site. The events at the Soundstage are not considered new, based on discussions with the County. Refer to *Riverwatch v. County of San Diego*, which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities. Thus, the Project would improve an existing multi-use commercial site, as evidenced in the IS/MND, and as discussed throughout these responses to comments.

12-9 Please refer to response to comment 2-3, which addresses the use of the Pioneertown Soundstage to hold events in the past, and as part of the existing setting. The IS/MND has evaluated the Project as described in the IS/MND Project Description, and as supplemented by these responses to comments.

12-10 The design of restrooms in the 'common area' of the site will be utilizing a Biofilter Toilet that rapidly transforms human waste into a probiotic resource. Two of Pioneertown's most sensitive issues are water and waste, these toilets do not use a DROP of water instead of pumping a holding tank or having to create large septic/leach lines.

Waterless toilets are a critical innovation for regions implementing water conservation practices. By eliminating or reducing the need for flushing, they conserve thousands of liters of water annually. In areas with limited water access, such as drought-prone regions or arid climates, these toilets provide a sustainable sanitation solution.

Systems are designed for versatility and durability, providing robust sanitation for medium- to high-use scenarios. These types of facilities are utilized in an array of scenarios and operated efficiently and effectively.

Another option that may be available is a 'project' that the County of San Bernardino has funded to provide 'public restrooms' for the Mane Street corridor of Pioneertown. Should it be determined that the placement of these restrooms is suited for this area of the site the Applicant will work with County staff to implement this phase of development. A Special Use Permit (SUP) process may be required as a condition of approval.

Depending on the preferred type of rest rooms to be installed there would be a maintenance and operational schedule developed to service and maintain these facilities depending on usage, time of year and or any special events being planned along Mane Street.

As many of the restroom facilities found throughout the Mane Street corridor, e.g. The Soundstage, Red Dog Saloon, Pappy & Harriett's, Pioneer Bowl; these 'grandfathered' uses and facilities are managed with increased maintenance schedules / pumping of tanks, augmented with other modular units during 'special events' activities and replacement of aging units.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-11 Refer to response to comment 12-10, which addresses the comments pertaining to restrooms in the common area within the Project site. The Soundstage would be connected to the new Septic system as described in the IS/MND. The existing septic tank at Soundstage and Pioneertown Gazette would be abated and replaced with environmentally upgraded septic system (one septic tank that includes three leach lines). This system would be both more efficient than the existing system at processing septic waste, and further, would be developed to prevent septic leeching into the underlying soils or groundwater table. As described under Subchapter VII, Geology and Soils, the new septic tank system will be capable of handling about 2,000 gallons of waste per day and will be developed in accordance with current California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards, which sets parameters for private sewage disposal, and in compliance with the County Development Code, Article 6. The septic system has been evaluated by professionals in their fields (Sladden Engineering), and have been determined to be sufficient to serve the proposed Project. Thus, these circumstances are anticipated to be avoided by meeting the above regulatory requirements. Further, the septic system will be maintained on a regular basis as described in the IS/MND.

12-12 In relation to the comment as it pertains to parking, please refer to responses to comments 2-1 and 2-3. In relation to the comment as it pertains to peak hour traffic, the Pioneertown Soundstage is being treated as an existing use, and as such, the TSA utilized the established criteria as specified in the County TIA Guidelines, which stipulates the method of trip generation forecasts. The Project TSA was reviewed by the County in November 2024 and Peer Reviewed in October 2025. The Project TSA listed existing buildings to be remodeled with existing land uses and new proposed land uses. The trip generation forecast takes into account new land uses with credit for the retired land use at the Pioneertown Soundstage. Human behavior that falls outside of the bounds of what is legal is not the focus of the CEQA evaluation, as suggested in the final paragraph of this comment. Erratic driving behavior is for the consideration of law enforcement officials, but is not a quantifiable impact pertaining specifically to this Project. Also, please refer to response to comment 11-3, which addresses cumulative traffic.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-13 Please refer to response to comment 11-3, which addresses light trespass impacts, and thereby addresses this comment.

12-14 Please refer to response to comment 11-3, and further note that the string lighting would be shielded such that light pollution is minimized and such that the Project does adversely impact dark skies.

12-15 Please refer to response to comment 12-12, as the Pioneertown Soundstage is being treated as an existing use, and thereby it is appropriate to assume that the use of the space for sporadic events would conform to that which is expected to occur at present; thereby light trespass would be associated with the other on-site uses. Further, the proposed Project is not in close proximity to any residential uses, meaning that headlights would, under most conditions, travel about 200 feet per the California Vehicle Code (§ 24410) with the light projection minimizing as the light travels farther away from the vehicle, and the nearest residential structure in any direction when entering or leaving the site that wouldn't be obstructed by structures wherever direction vehicles face is over 240 feet from the Project boundary.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-16 Please refer to responses to comments 4-2 and 7-9, which address fugitive dust.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-17 Refer to response to comment 12-10, which addresses the comments pertaining to restrooms in the common area within the Project site.

12-18 The comment provides a list of operations that the proposed septic tank can support, but does not provide a source for these calculations. Please refer to responses to comments 8-28 and 11-3, which address the septic capacity, as well as the potential for groundwater contamination. Further, the wells referenced as having a potential for contamination do not appear to be in use, as wells were not meeting the State standards for drinking water.[9] Regardless, utilizing septic best management practices in conformance with the California Plumbing Code (Part 5, Title 24, California Code of Regulations) standards would ensure that the use of septic within the site would not result in groundwater contamination. As such, water is serviced via the San Bernardino County Department of Public Works Special Districts Water and Sanitation Division (District), as discussed in detail under Subchapter X, Hydrology and Water Quality.

[9] https://www.sbsun.com/2019/12/02/pioneertown-residents-now-have-clean-tap-water-for-the-first-time-in-decades/?clearUserState=true

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-19 The comment conveys concern related to moderate wildfire risk versus the surrounding high fire hazard severity zones located in the surrounding area. The proposed Project is located in a Moderate FHSZ, and further, has been recently established as a Moderate FHSZ. As with other communities that are surrounded by higher FHSZs—a more extreme example would be the Big Bear Valley, wherein a majority of the area is considered to be located within a Very High FHSZ, rather than a High FHSZ as is the case for Pioneertown, in the event of a wildfire, typically the wildfire hazard does not approach from all directions surrounding a given community, but rather approaches from one general direction (west in the case of Pioneertown due to its proximity to the San Bernardino National Forest). Thus, while the Project is located in a Moderate FHSZ, the IS/MND hereby acknowledges that the Project is located in an area surrounded by a High FHSZ. The Project impacts remain the same, as evidenced in responses to comments 12-19 and 12-20 and beyond herein. What's more is that the Cal Fire FHSZ maps previous to 2024 (per the Countywide Plan)[10] indicate that Pioneertown was entirely located within a High FHSZ, suggesting that Cal Fire's reevaluation of the FHSZ for the Project area prompted lowering the risk level for the area within which the Project is located.

[10] https://www.arcgis.com/apps/webappviewer/index.html?id=355f9beb4a8f446e8869459e91d58431

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-20 Refer to the analysis provided under Subchapter XX(a) and under IX(g) of the IS/MND. The comment shows a map of the Sawtooth Complex fire, and alleges that this pattern would make evacuation difficult if not impossible. While the Sawtooth Complex fire was devastating, the County has improved its evacuation mechanisms since this wildfire occurred. This is evidenced by the San Bernardino Countywide Plan PEIR, which indicates "*The specific emergency routes employed in the case of an actual emergency will be designated by evacuation authorities based on emergency conditions and will be communicated to residents at the time of the emergency. County Fire OES has a "Critical Route Planning Committee" that is developing countywide routes and alternate routes for use in evacuating residents [and visitors] from a disaster area while simultaneously allowing first responders' access into a disaster area without congestion and gridlock…. Projects developed under the Countywide Plan would not block or otherwise interfere with use of evacuation routes. Projects would not interfere with operation of the County Emergency Operations Center and would not interfere with operations of emergency response agencies or with coordination and cooperation between such agencies."* The proposed Project would comply with the Countywide Plan land use designation for the Project site, and the proposed Project is located in proximity to several evacuation routes leading in multiple directions from the Project site which is anticipated to facilitate successful evacuation of the site during potential emergency events.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-21 The IS/MND relies on the County's evacuation routes per Figure IX-3, and acknowledges that Pioneertown Road leads in both directions away from the site in the event of an evacuation. The commenter is correct that Pioneertown Road leaves to Highway 62 and that Pipes Canyon Road leads to the 247. Regardless, the responses to comments 12-19 and 12-20, above, address wildfire evacuation. Further, the use of the Cal Fire Maps, is the appropriate means by which to determine the fire hazard severity for a given Project, not the CA Fair Plan Insurance ratings. The Wildfire checklist questions are predicated on the FHSZs developed by Cal Fire.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-22 The IS/MND does not omit the location of fire stations in the Project area. This is discussed under Subchapter XV, Public Services, which indicates that the closest fire station to the Project site is located about 6 miles to the southeast of the Project (Station #41). Refer to response to comment 11-8, which addresses fire stations.

12-23 The comment pertains to evacuation, which is addressed under responses to comments 12-19 and 12-20, above.

12-24 The comment does not point to any specific point in the IS/MND that suffers from this alleged infirmity, and as such the County cannot provide further comment on this matter.

12-25 The comment puts forth the winds frequently exceed the source cited in the IS/MND. However, the commenter does not provide a specific source citing where this data comes from other than anecdotal sources, and the use of historical data presented in the Initial Study is indicative of average wind speeds, which is an appropriate measure by which to determine whether the Project would, 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 wildfire. The County has not stated that the desert cannot burn, and this is why this Project would not result in significant wildfire hazards; the IS/MND focuses on impairing an emergency response/evacuation plan, exacerbating wildfire risk, and exposing people or structures to risks that are secondary effects of wildfire such as flooding or landslides. The IS/MND notes that the fuel within the Project area, which is far more limited than in the surrounding desert, would create less than ideal conditions for uncontrolled spread of wildfire.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-26 The commenter provides background data from a source that is not cited, and therefore cannot be verified. The comment broadly claims that the IS/MND failed to meet the "above requirement," but fails to state what specific requirements warrant further consideration. Water supply is analyzed to be adequate, particularly as it is a source with backup supply as described under Subchapter X, Hydrology and Water Quality (b). The density of Pioneertown in the area immediately surrounding the Project is more medium-density than the residences surrounding the Mane Street. The site itself is flat, and as a result, topography would not present exacerbated wildfire conditions. Wind patterns are discussed under response to comment 12-25. Further, importantly the San Bernardino Countywide Plan PEIR justifies that the implementation of the Countywide Plan would not "expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to the urbanized areas or where residences are intermixed with wildlands" because the General Plan is located within a Moderate FHSZ, which suggests that, by the Lead Agency's own logic, the proposed Project's location within a Moderate FHSZ is indicative of a less than significant impact.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-27 The concerns related to unpermitted events are under the purview of Code Enforcement, and do not have bearing on the Project moving through the County's Development Application process. Refer to *Riverwatch v. County of San Diego*,[11] which concluded that CEQA is not to be used as enforcement for violation of other environmental laws and existing conditions deemed the proper baseline, despite prior illegal activities.

[11] https://www.casemine.com/judgement/us/627e1acf714d585d57cb659f

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-28 Please refer to response to comment 11-3, which further expounds on cumulative impacts related to the proposed Project development.

RESPONSE TO COMMENT
LETTER #12
Kerrie Aley

12-29 First, it should be noted that the proposed Project has been described as an accessory, supporting or complimentary use to the existing uses found within Pioneertown, which include the existing use of the Soundstage for events. Activities occurring within Pioneertown are due to a number of factors attributed to existing commercial and community activities. Certain activities are 'seasonal' due to weather conditions, while others occur primarily during daylight hours while others occur after dark. The proposed Project will continue to provide use of the site and structures for specific events but also to accommodate the visitors to the area thar are already in Pioneertown for the day, weekend or otherwise. The main influx of visitors to Pioneertown, other than seasonal special events, filming and charity venues are drawn by Pappy & Harriett's entertainment events which are held between 5:30 PM and 10:00 PM (and sometimes later). The 'spill-over' from pre-event and post-event will be captured by existing and newly approved facilities such as the Pioneertown Motel Project, The Soundstage, the Red Dog and nearby camping, Air B&B and others, some operating from 7 a.m. to midnight, the motel facility will be open to guests and staffed 24 hours a day, seven days a week. The commenter alleges that the ABC permit associated with the on-site use would result in a greater need for police and fire services, but neither the County Sheriff, nor County Fire have provided any objections to the Project. Further, the proposed Project must adhere to standard conditions by the San Bernardino County Fire Department to ensure adequate fire flow, access, and fire suppression is provided at the proposed Project site. Please refer to responses to comments 6-2 and 11-8, which address police and fire protection services.

Responses to comments 8-28 and 11-3 address the septic system. Responses to comments 4-2 and 7-9, which address fugitive dust. Responses to comments 2-1 and 2-3 address parking. Responses to comments 7-4, 5, 6, and 7 address noise.

12-30 The comment is conclusory in nature, and conveys the commenters opposition to the Project. The comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #13
Pioneertown Sun / Curt Sautter

13-1 The comment describes perceived noise violations by Pappy and Harriet's, which is an operation that is not associated with the proposed Project, and as a result, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

13-2 The comment pertains to operations at Pappy and Harriet's, which is an operation that is not associated with the proposed Project, and as a result, the comment is noted and will be made available to County decision-makers as part of the Final IS/MND package prior to a decision on the proposed Project.

RESPONSE TO COMMENT
LETTER #13
Pioneertown Sun / Curt Sautter

13-3 The comment describes perceived noise violations by Pappy and Harriet's, which is an operation that is not associated with the proposed Project. Further, it requests that noise level readings be taken at further outdoor events at Pappy and Harriet. It is unclear how this relates to the Pioneertown Soundstage Project, but the County directs the commenter to responses to comments 7-4, 5, 6, and 7, which pertain to the noise modeling that was performed for this Project.

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

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

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

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

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

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

The use of 12,449 SF in the NOC included the impervious area developed in association with the ADA parking. This figure has since been updated through these responses to comments to include the uses

presented in the above paragraph—the site plan as currently proposed shows the Soundstage (6,223 SF) and its enclosed Outdoor Patio (3,258 SF), Pioneertown Gazette (831 SF), Mobile Kitchen Trailer (225 SF), Restroom Trailer (250 SF), Mobile Snack Cart (aka Mini Horse Kiosk 145 SF), Outdoor Dining Pavillion (3,024 SF), and ADA Parking (1,976 SF)—which were included in the analysis presented in the IS/MND. Thus, these corrections do not materially change the conclusions found in the IS/MND and thereby does not constitute a substantial revision requiring recirculation pursuant to CEQA Section 15073.5.

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

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