

SAN BERNARDINO COUNTY INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

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

PROJECT LABEL:

APN: 0571-191-06 and 0571-181-03
APPLICANT: US Iron, LLC
COMMUNITY: Baker
LOCATION: The site is located on BLM managed public lands in the Kingston Range approximately 20 miles southeast of Tecopa, California, just within the northern boundary of San Bernardino County (Figure 1).
PROJECT NO: AP20120012
STAFF: Ernest Perea
REP(S): US Iron, LLC
PROPOSAL: US Iron, LLC is submitting a Reclamation Plan for their Bureau of Land Management approved Plan of Operations to remove historically stockpiled iron ore tailings from a 20-acre site followed by reclamation.

USGS Quad: Horse Thief Springs
T, R, Section: T: R: Sec: 4
19/20N 10E & 33
Thomas Bros.: Page 330, Grid: G-2

Planning Area: CJDJ (CJ17)
Land Use Zoning: Resource Conservation (RC) within BLM Land

Overlays: None

PROJECT CONTACT INFORMATION:

Lead agency: County of San Bernardino
Land Use Services Department - Current Planning
385 North Arrowhead Avenue
San Bernardino, CA 92415-0182

Contact person: Ernest Perea
Phone No: (951) 214-2739 Fax No.: (909) 387-3223
E-mail: ernestperea@ymail.com

Project Sponsor: US Iron, LLC
755 Grand Blvd, Ste B105 #316
Miramar Beach, FL 32550
Phone No: (765) 210-4111
E-mail: mark@sportship.com

OVERVIEW AND PROJECT DESCRIPTION:

US Iron, LLC is submitting a Reclamation Plan for their Bureau of Land Management (BLM) approved Plan of Operations (POO) to remove historically stockpiled iron ore tailings from a 20-acre site in accordance with the Surface Mining and Reclamation Act of 1975 (SMARA), Public Resources Codes 2770 et seq and San Bernardino County requirements for implementing SMARA. The site is located on BLM managed public lands in the Kingston Range approximately 20 miles southeast of Tecopa, California, just within the northern boundary of San Bernardino County (see Figure 1). The project site is located approximately 1.5 miles east of the Beck Mine on a portion of the unpatented lode claim Iron Gossan #8 and on five mill sites designated Beck 1 through Beck 5 recently located over the tailings area to facilitate the proposed activity (see Figure 2). Figure 3 includes a photograph of the site.

Background

US Iron is the operator and Standard Industrial Minerals is the owner of the Beck Mine, claims, and mill sites. In February 2011, US Iron leased the Beck Mine and its mining claims from its owner, Standard Industrial Minerals. US Iron subsequently submitted a POO for the removal of the existing iron ore tailings stockpiled on Iron Gossan #8 by previous owners in the 1960s. The BLM in their Decision Record and Environmental Assessment (EA) approved the Beck Mine Mill Site POO for the removal and transport of the tailings to the Beck Mine processing plant and reclamation of the site on November 21, 2011. Refer to the Reclamation Plan, Appendix A for a copy of the POO and Appendix B for copies of the Decision Record and EA. As of November 15, 2011, Standard Industrial Minerals located five mill sites of five acres each designated as Beck 1 through Beck 5, which are also part of US Iron lease.

Unlike most reclamation plans which reclaim areas planned for mining, this Reclamation Plan will reclaim a 20-acre site after the removal of existing stockpiled iron ore tailings deposited historically prior to the enactment of SMARA. The removal of the tailings (considered the operations) will provide a marketable product and a heavily disturbed area will subsequently be reclaimed back to public open space. The tailings are stockpiled up to about 30 feet in depth and contain an estimated 880,000 cubic yards (cy) of tailings. US Iron will utilize scrapers to remove the previously crushed/sorted tailings and transport the material to the Beck Mine processing plant 1.5 miles to the west. Operations are planned for a 10-year period.

The reclamation activities will be conducted after the removal of the tailings and will consist of final grading and revegetation for an approximate two week period followed by revegetation monitoring until success criteria are achieved.

Operations

The BLM approved the Beck Mine Mill Site POO to allow the removal and transport of iron ore tailings. The iron ore tailings were previously crushed and sorted by previous owners in the 1960s and are a marketable product in their current state. The iron ore tailings will be transported to the Beck Mine processing plant by scraper and haul truck located approximately 1.5 miles west along the Smith Talc Road at posted speed limits of 20 mph, further sorted, and then transported by highway legal trucks northwest along Smith Talc Road to various customers (refer to Figure 2). Figure 2 shows the tailings site in relation to the existing Beck Mine processing plant along Excelsior Mine Road. The talc mine seen directly adjacent or to the southwest of the tailings site (see Figure 4) is not a part of the project.

The tailings removal operation is a simple scraping of the sized tailings deposited in leveled stockpiles to an estimated depth of up to 30 feet above the original ground surface. Figure 3 includes a photograph of the site looking east showing the generally level area of stockpiled tailings with some isolated revegetation. The concrete structure in the foreground is the remnants of the crusher/stacker facility that will be removed. The public BLM access road cuts directly across the site. The BLM has required the road to be temporarily blocked off during operations and travelers will use a by-pass road partially seen on the right or south of the site. This road is shown on Figure 2 and the Reclamation Plan (Figure 4) shows the existing conditions and the final reclaimed condition for use as open space.

Methods for the tailings removal include occasional ripping the tailings by a dozer and ripper attachment followed by standard scraper operations. The procedure generally includes:

- Removal and crushing of the sparse vegetation with any windblown growth media stockpiled in disturbed areas along the perimeter of the area on the north and west;
- Ripping of tailings surface as needed to facilitate scraping;
- Removal of tailings in approximately 6-inch lifts depending on the size of the material and transported by the scraper to the Beck Mine processing plant 1.5 miles to the northwest; and
- Occasional use of a loader and a haul or dump truck to transport material to the plant site.

Table 1 shows a typical equipment list. Equivalent equipment may be used in the future. The mill site will operate with one and sometimes two equipment operators working a single daytime shift (between 7 am to 7 pm) Monday through Friday. Only daytime operations will be conducted; no lighting will be used onsite. No storage or maintenance of equipment will be undertaken at the mill site. All maintenance will be performed on the Beck Mine processing site and all equipment will be stored at this location as well.

**Table 1
Beck Mill Site Reclamation Plan
Typical Equipment List**

Quantity	Equipment Type
1	Caterpillar 637D Scraper
1	Komatsu 155AX Dozer with ripper attachment
1	Ford Water Truck – 2,000 gallon
1	Loader (varies)
1	Haul truck (varies)

Note that similar makes and types of equipment may be used over the life of the project.

Reclamation

Reclamation will be undertaken upon completion of the removal of the tailings to the original surface. The site would be graded to allow drainage to flow eastward into the existing drainages north and south of the road. There will be no remaining slopes onsite. The Excelsior Mine Road will be re-constructed to a road surface of 20 feet wide and returned to a safe drivable condition as determined by the BLM. The bypass road that is currently cut will be left in-place.

The area to be reclaimed will be ripped to a depth of one-foot and any salvaged plant and soil material will be placed in scattered locations to a depth of 6 inches. In addition, any alluvium surface material separated at the Beck Mine Processing Plant will be placed on the mill site to aid in vegetation. Revegetation will be conducted through seeding with an approved native plant seed mix and the area flagged off to avoid further disturbance until the site meets its success criteria. The reclaimed end use will be open space on public land managed by the BLM.

Project Life

The anticipated production rate will be an average approximately 1,000 tons per day or 365 cy per day, assuming a weight of 2.75 tons per cy. Annual production would be up to 250,000 tons per year (approx. 91,000 cy/year) with a maximum of 400,000 tons per year (approx. 150,000 cy/year) depending on demand.

If the tailings are removed at the average rate of 1,000 tons per day or 91,000 cy/year, sufficient material would be available for approximately 10 years of operation. The applicant is requesting a Reclamation Plan approval for a 10-year operational period with one year for reclamation and revegetation followed by revegetation monitoring until success criteria are satisfied.

PROJECT LOCATION

The subject property is located in unincorporated Desert Region of San Bernardino County. The site is located on BLM managed public lands in the Kingston Range approximately 20 miles southeast of Tecopa, California, just within the northern boundary of San Bernardino County (see Figure 1). The project site is located approximately 1.5 miles east of the Beck Mine on a portion of the unpatented lode claim Iron Gossan #8 and on five mill sites designated Beck 1 through Beck 5 recently located over the tailings area to facilitate the proposed activity (see Figure 2).

ENVIRONMENTAL/EXISTING SITE CONDITIONS:

AREA	EXISTING LAND USE	LAND USE/OVERLAY DISTRICT
Site	Vacant/Stockpiled Iron Ore Tailings	Resource Conservation (RC)
North	Vacant	Resource Conservation (RC)
South	Vacant	Resource Conservation (RC)
East	Vacant	Resource Conservation (RC)
West	Vacant	Resource Conservation (RC)

The mill site is a small valley area with alluvium and rock surface presently covered with stockpiled iron ore tailings. The tailings are stockpiled up to about 30 feet in depth and contain an estimated 880,000 cubic yards (cy) of tailings. The Beck Mine processing plant 1.5 miles to the west.

Vegetation in areas surrounding the project site as recorded at a reference site to the south of the site, consists of a widespread homogeneous black bush (*Coleogyne ramosissima*) dominant and antelope bush (*Purshia tridentata*) second dominant vegetative series. Black bush is native to Southern California, Arizona, Utah, southwestern Colorado, and Nevada. Black bush inhabits gravelly slopes, desert mesas, and foothills of the mountains in the western Colorado Desert and eastern Mojave Desert, north to Inyo County, in the lower and upper Sonoran Life Zones.

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

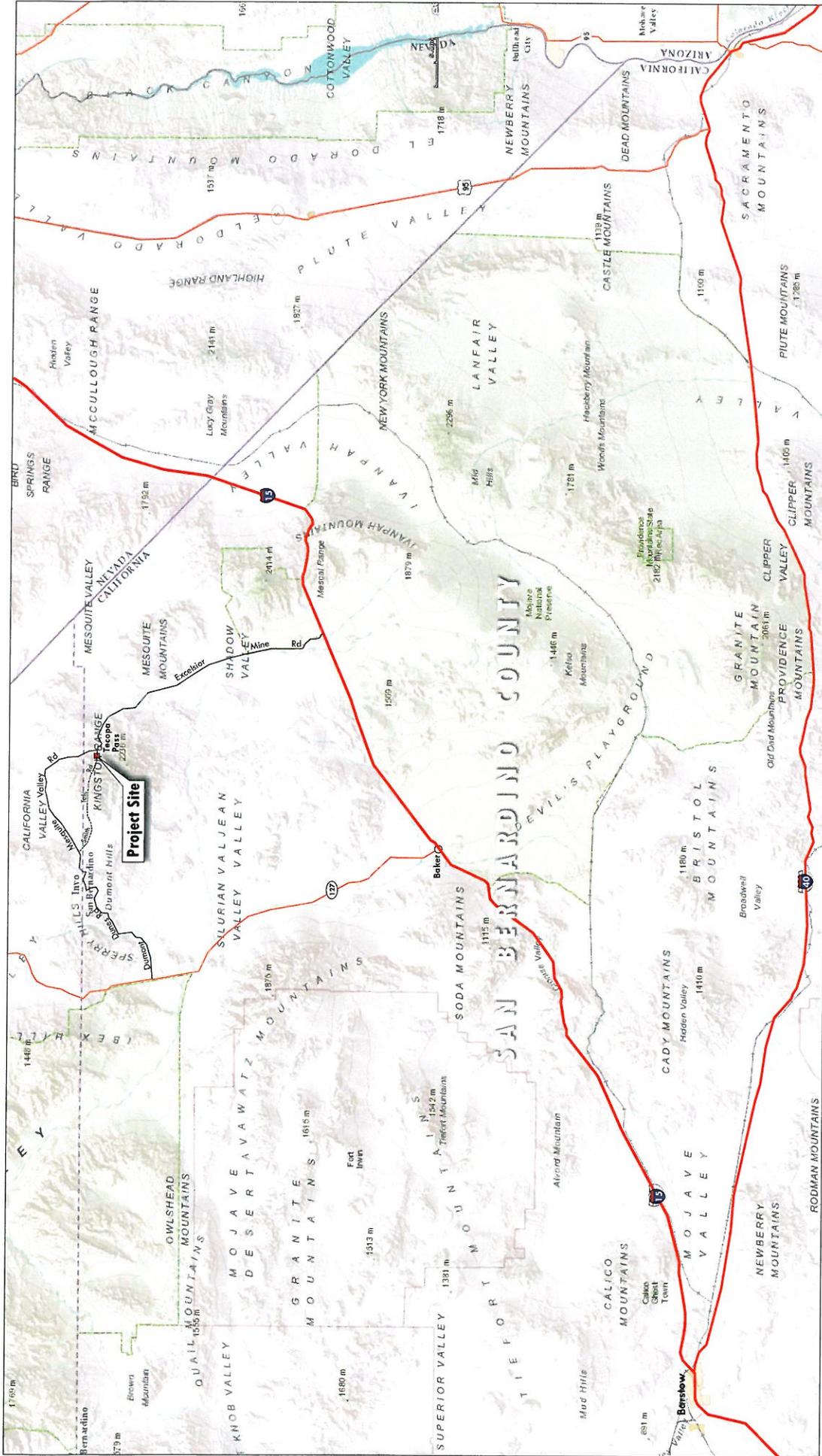
Federal: None.

State of California: None.

County of San Bernardino: Land Use Services Department- Code Enforcement, Building and Safety, Public Health-Environmental Health Services, Special Districts, Public Works, and County Fire.

Regional: Mojave Desert Air Quality Management District (MDAQMD).

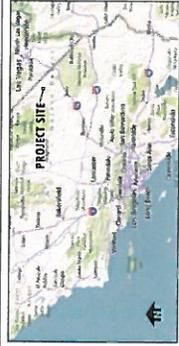
Local: None



REGIONAL LOCATION
 Reclamation Plan for Beck Mine Mill Sites Tailings Removal - US Iron, LLC
 County of San Bernardino, California

Project Site Location (Geographic Location)
 California Zone 5 (PPS 405): 7181756.86 2474974.63
 Lat/Lon: 35° 46' 31.1779" N, 115° 54' 34.9308" W

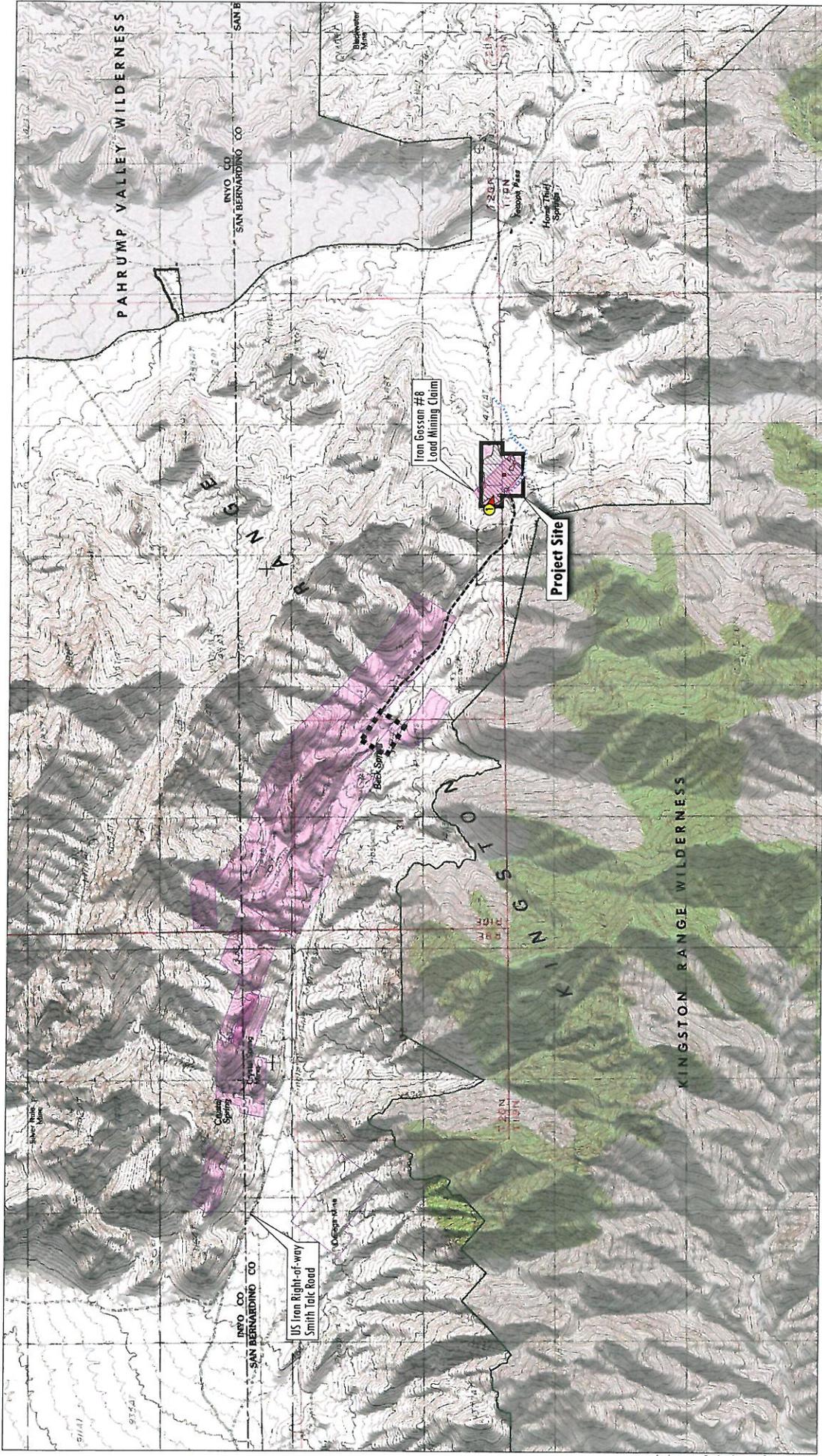
LEGEND



Source: National Topographic, 2011 (NGC)
LILBURN CORPORATION

FIGURE 1

File: P:\BMR\Reg-LCC (TMQ) Reg\1 REV12.16.2011



LEGEND

- North Arrow
- Scale: 0 to 2,000 Feet
- Source: USGS Contourlines & NED 10m DEMs
- Source: Bathymetry Map for Open Coast 1:50,000
- Safety: National Fire of Operations 7/12/2011
- Project Site (Mill Site Claims 1 through 5)
- Approximate Geographic Center of Project Site:
California Zone 5 (FIPS 403): 7181756.86 2474974.63
Lat/Lon: 35° 46' 31.17779" N, 115° 54' 34.9308" W
- Area of Existing Disturbance
- Bypass Road (during active operations)
- Existing Back Mine Processing Plant
- Existing Road to Existing Back Mine Processing Plant
- Back Mining Claims
- Wilderness Boundary
- Site Photograph and Direction of view (See Figure 3)

PROJECT VICINITY
 Reclamation Plan for Beck Mine Mill Sites Tailings Removal - US Iron, LLC
 County of San Bernardino, California

FIGURE 2



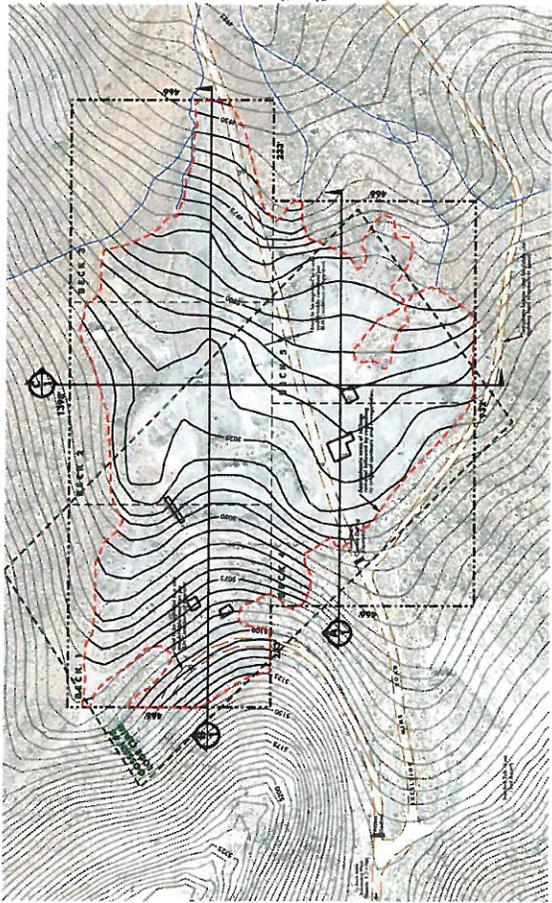
Photograph 1: View looking east towards the Project Site. Existing bypass road is to the extreme right. See Figure 2 for photograph location.

FIG. 11 BMR-Rd-02 LocCR (TAO) Page 13 REV 12/16/2011

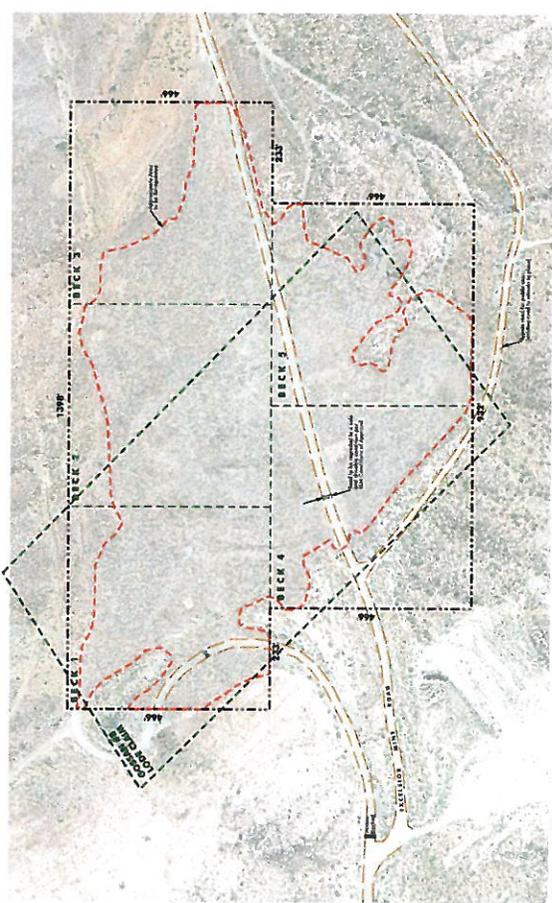
PROJECT SITE PHOTOGRAPH

Redemption Plan for Beck Mine Mill Sites Tailings Removal - US Iron, LLC
County of San Bernardino, California

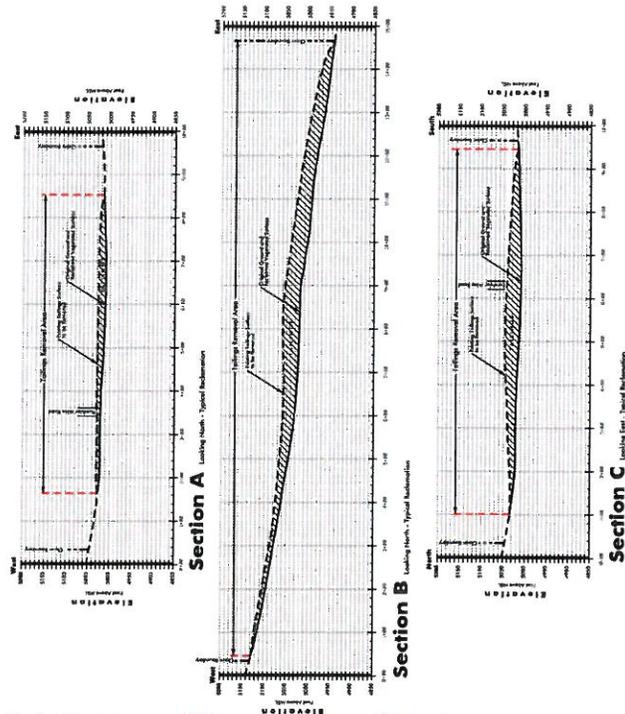
FIGURE 3



Plan View A
 Reclamation Orientation
 Scale: 1" = 100'



Plan View B
 Scale: 1" = 100' (Not to Scale with Resignation of Bond of 10 years)



Notes

1. See Plan View A for location of sections.
2. All slopes shall be 1:1 unless otherwise noted.
3. All slopes shall be 1:1.5 unless otherwise noted.
4. All slopes shall be 1:2 unless otherwise noted.
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102. All slopes shall be 1:100 unless otherwise noted.

RECLAMATION PLAN for BECK MINE MILL SITES TAILINGS REMOVAL

Reclamation Plan for Beck Mine Mill Sites Tailings Removal - JIS Inc, LLC
 County of San Bernardino, California

FIGURE 4



**LILBURN
 CORPORATION**

EVALUATION FORMAT

This initial study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on seventeen (17) major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

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

1. **No Impact:** No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact:** No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated:** Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact:** Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

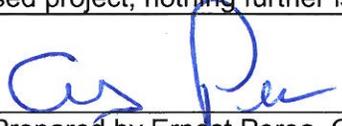
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use/ Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

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

<input type="checkbox"/>	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
<input checked="" type="checkbox"/>	Although the proposed project could have a significant effect on the environment, there shall 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 shall be prepared.
<input type="checkbox"/>	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


 Signature: Prepared by Ernest Perea, Contract Planner

5-15-12
 Date


 Signature: Terri Rahhal, Planning Manager

5-15-12
 Date

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
I. AESTHETICS - Would the project				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

- I a) **No Impact.** According to The San Bernardino County General Plan the project site is not within a scenic vista. .
- I b) **No Impact.** According to The San Bernardino County General Plan the project site is not within a scenic route (Ref. General Plan Pg. IV-16) . Therefore, no impact is anticipated
- I c) **Less than Significant.** The project site is located approximately 1.5 miles east of the Beck Mine on a portion of the unpatented lode claim Iron Gossan #8 and on five mill sites designated Beck 1 through Beck 5 recently located over the tailings area to facilitate the proposed activity (see Figures 2 and 3). The visual character of the site and surroundings is that of an existing mining operation. Iron ore tailings are stockpiled up to about 30 feet in depth The proposed use is an allowable use within the Resources Conservation Land Use Zoning District. The removal of the tailings and reclamation of the site will improve the existing visual character of the area. Therefore, less than significant impact is anticipated.
- I d) **No Impact.** The Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. No new light sources are proposed and therefore no impacts are anticipated.

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorpor.	Less than Significant	No Impact
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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

- II a) **No Impact.** The proposed project will have no impact to agricultural resources, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. There are no agricultural land uses within the subject property or in the vicinity.
- II b) **No Impact.** The Project Site is not designated as agricultural land use or Williamson Act land. The Proposed Project would not conflict with current zoning. No impact is anticipated. Therefore, the project will not conflict with existing zoning for agricultural use, or a Williamson Act contract.
- II c/d) **No Impact.** The Project Site and surrounding area does not occur within forest land, timberland, or timberland zoned production. No impacts to these resource lands would result with implementation of the Proposed Project.
- II e) **No Impact.** The proposed project will not have any direct or indirect impacts to agricultural resources in the County including the conversion of Farmland to non-agricultural uses.

ISSUES	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SUBSTANTIATION (Discuss conformity with the South Coast Air Quality Management Plan, if applicable):				

The Project Site is located in the Mojave Desert Air Basin (MDAB). The Mojave Desert Air Quality Management District (MDAQMD) has jurisdiction over air quality issues and regulations within the MDAB. To assist local agencies to determine if a project's emissions could pose a significant threat to air quality, the MDAQMD has prepared *the California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, August 2011*. The air and dust emissions from the operational use of the Project were evaluated and compared to the MDAQMD standards and evaluated against the most recent thresholds applicable.

III a) **Less than Significant.** Unlike most reclamation plans which reclaim areas planned for mining, this Reclamation Plan will reclaim a 20-acre site covered with iron ore tailings deposited historically prior to the enactment of SMARA. Operations are considered the removal of the tailings on approximately 20 acres over 10 years. Reclamation of the site after the removal of the tailings would involve the final grading/revegetation of the site. The project site is within the MDAB and under the jurisdiction of the MDAQMD. The MDAQMD is responsible for updating the Air Quality Management Plan (AQMP). The AQMP was developed for the primary purpose of controlling emissions to maintain all federal and state ambient air standards for the district. A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast.

The Project is consistent with the zoning and land use classifications that were used to prepare the Mojave Desert AQMP (Resource Conservation/RC). In addition, based on Table 2, Project-generated emissions generated will not exceed emission thresholds. (See Table 2). Therefore, the Project's emissions are in compliance with the thresholds established by the Mojave Desert Air Quality Management District. The project would not significantly increase local air emissions and therefore would not conflict with or obstruct implementation of the plan. Therefore, no impact is anticipated.

- III b) **Less than Significant.** Reclamation activities would require earthmoving, and other activities typically associated with final grading and revegetation for an approximate two week period. The Proposed Project was screened for emissions generation using MDAQMD guidelines, and Off-Road Mobile Source Emissions Factors (2012). These tables and/or model were used to generate emissions estimates for mining operations. The criteria pollutants screened for included: reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), and particulates (PM₁₀ and PM_{2.5}). Two of these, ROG and NO_x, are ozone precursors.

Typically daily operations were screened for the following: a water truck, a scraper/grader, and a miscellaneous material handling equipment. This would occur for approximately 14 days. Refer to Table 1 for Reclamation Activities emissions.

Table 2
Reclamation Activities Emissions
Beck Mill Site Reclamation Plan
(Pounds per Day)

Source ¹	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Water Truck	0.4	3.7	1.6	0.2	0.2
Scraper/Grader	2.5	21.6	9.6	1.0	0.9
Other Material Handling Equipment	1.6	12.0	4.2	0.6	0.5
Totals (lbs/day)	4.5	37.3	15.4	1.8	1.6
MDAQMD Threshold (lbs/day)	137	137	548	82	82
Significant	No	No	No	No	No

¹ Off-Road Mobile Source Emissions Factors (2012)

As shown in Table 1, Project emissions would not exceed MDAQMD thresholds.

Compliance with MDAQMD Regulation II and Rules 402 and 403

Although the Proposed Project does not exceed MDAQMD thresholds, the Applicant is required to comply with all applicable MDAQMD rules and regulations as the MDAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5} (state)). To limit dust production, the Applicant must comply with Rules 402 nuisance and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACM) for each fugitive dust source. This would include, but not be limited to the following BACMs:

1. The Project proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.
 - I. The Project proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading and mining activity on the site. Portions of the site that are actively being mined shall be watered to ensure that a crust is formed on the ground surface, and shall be watered at the end of each workday.

- II. The Project proponent shall ensure that all disturbed areas are treated to prevent erosion.
- III. The Project proponent shall ensure that all mining and processing activities are suspended when winds exceed 25 miles per hour.

Exhaust emissions from vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO_x and PM₁₀ levels in the area. Although the Proposed Project would not exceed MDAQMD thresholds during operations, the Applicant would be required to implement the following conditions as required by MDAQMD:

- 2. All equipment used for mining and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
- 3. The operator shall maintain and effectively utilize and schedule on-site equipment and on-site and off-site haul trucks in order to minimize exhaust emissions from truck idling.
- 4. The operator shall comply with all existing and future CARB and MDAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.
- 5. The aggregate crusher must obtain permits to construct and annually renew permits to operate from the MDAQMD and be in compliance with such permits.

MDAQMD rules for diesel emissions from equipment and trucks are embedded in the compliance for all diesel fueled engines, trucks, and equipment with the statewide CARB Diesel Reduction Plan. These measures will be implemented by CARB in phases with new rules imposed on existing and new diesel-fueled engines.

- III c) **Less than Significant.** The Project is located in a region that has been identified as being in Non-Attainment for Ozone and PM10 (State) according to the California Air Resources Board Area Designation Maps. This means that the background concentration of these pollutants have historically been over the Federal and/or State Ambient Air Quality Standards. With respect to air quality, no individual project would by itself result in Non-Attainment of the Federal or State Ambient Air Quality Standards. However, a project's air pollution emissions although individually limited, may be cumulatively considerable when taken in combination with past, present, and future development projects. In order to be considered significant, a project's air pollutant emissions must exceed the emission thresholds established by the regional Air Quality Management District.

As shown in Table 2, the thresholds for the above referenced criteria pollutants would not be exceeded by the Project. Therefore, impacts from the Project are not cumulatively considerable when included with other past, present, and future probable projects.

- III d) **No Impact.** The Proposed Project is located in a remote area of northeastern San Bernardino County, east of the San Bernardino Mountains. No sensitive receptors are located within the project vicinity. Therefore, no impacts are anticipated.
- III e) **No Impact.** The Proposed Project is Reclamation of iron ore tailings stockpiled on 20 acres. The generation of objectionable odors is typically not associated with Reclamation activities and there are no sensitive receptors within the project vicinity. Therefore, no impact is anticipated.

ISSUES	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
IV. BIOLOGICAL RESOURCES - Would the project:				
a) Have substantial adverse effects, 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc...) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION (Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database):

IV **Less than significant with Mitigation Incorporated.** Information on vegetation and wildlife a/b/d) is included in the BLM's EA. (See Appendix B). Existing vegetation on the tailings is sparse due to the stockpiled iron ore material. Vegetation in areas surrounding the project site as recorded at a reference site to the south of the site, consists of a widespread homogeneous black bush (*Coleogyne ramosissima*) dominant and antelope bush (*Purshia tridentata*) second dominant vegetative series. Black bush is native to Southern California, Arizona, Utah, southwestern Colorado, and Nevada. Black bush inhabits gravelly slopes, desert mesas, and foothills of the mountains in the western Colorado Desert and eastern Mojave Desert, north to Inyo County, in the lower and upper Sonoran Life Zones. No impact to vegetation or sensitive vegetation is anticipated.

General wildlife occurring in the area include cottontail rabbit, black-tail jackrabbit, mule deer, kit fox, antelope ground squirrel, coyote, kangaroo rats, western pipistrel, woodrats, common reptilian and bird species. The Kingston Range supports a population of desert bighorn, a BLM sensitive species, and the banded gila monster, a BLM sensitive species, has been sighted in rare instances. These species are not anticipated to be impacted as the site is predominately devoid of any vegetation

The Mojave population of the desert tortoise (*Gopherus agassizii*) is listed as a threatened species by both the US Fish and Wildlife Service and the State of California. Given the lack of suitable habitat and the elevation of the site, the likelihood of encounters with desert tortoise is minimal. However, in accordance with the approved POO Conditions of Approval (Refer Appendix B of The Reclamation Plan), the operator shall implement the following precautions in order to avoid impacts to the desert tortoise (BLM Condition numbers listed):

18. The operator is responsible for informing all personnel about the desert tortoise (which will include information provided by the BLM on the life history of the desert tortoise, its protected status, and protocols for dealing with tortoises if and when they are encountered) and the definition of "take".
19. Only biologists authorized by the USFWS and the BLM shall handle desert tortoises.
20. All personnel shall inspect for desert tortoises under vehicles prior to moving the vehicles. If a desert tortoise is present, participants shall wait for the tortoise to move out from under the vehicle prior to moving the vehicle. Any tortoise crossing a road will be left alone as it crosses.
21. All personnel shall follow all posted speed limits. Vehicle speeds shall not exceed 20 miles per or through tortoise habitat.
22. Except as explicitly stated in the plan of operations, cross country vehicle use by mine employees is prohibited during both work and non-work hours.
23. All trash and food items shall be promptly contained within closed in raven-proof containers. These shall be regularly removed from the project site to reduce attractiveness of the area to ravens and other tortoise predators.
24. In the event a desert tortoise is injured or killed, the field contact representatives will be notified immediately, who in turn will contact the BLM wildlife biologist in Needles at 760.326.7060/7011 or through Dispatch at 909.383.5652. If the wildlife biologist is not available, the U.S. Fish and Wildlife Service Law Enforcement Branch will be notified at 310.328.6307. The injured desert tortoise will be taken to the nearest veterinarian for treatment. Costs incurred will be the responsibility of the Operator.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant:

BIO-1. The operator is responsible for informing all personnel about the desert tortoise (which will include information provided by the BLM on the life history of the desert tortoise, its protected status, and protocols for dealing with tortoises if and when they are encountered) and the definition of "take".

BIO-2. Only biologists authorized by the USFWS and the BLM shall handle desert tortoises.

BIO-3. All personnel shall inspect for desert tortoises under vehicles prior to moving the vehicles. If a desert tortoise is present, participants shall wait for the tortoise to move out from under the vehicle prior to moving the vehicle. Any tortoise crossing a road will be left alone as it crosses.

BIO-4. All personnel shall follow all posted speed limits. Vehicle speeds shall not exceed 20 miles per or through tortoise habitat.

BIO-5. Except as explicitly stated in the plan of operations, cross country vehicle use by mine employees is prohibited during both work and non-work hours.

BIO-6. All trash and food items shall be promptly contained within closed in raven-proof containers. These shall be regularly removed from the project site to reduce attractiveness of the area to ravens and other tortoise predators.

BIO-7. In the event a desert tortoise is injured or killed, the field contact representatives will be notified immediately, who in turn will contact the BLM wildlife biologist in Needles at 760.326.7060/7011 or through Dispatch at 909.383.5652. If the wildlife biologist is not available, the U.S. Fish and Wildlife Service Law Enforcement Branch will be notified at 310.328.6307. The injured desert tortoise will be taken to the nearest veterinarian for treatment. Costs incurred will be the responsibility of the Operator.

IV c) **No Impact.** The project will not result in a direct or indirect adverse impact to any federally protected wetlands, as there are no wetlands onsite or in the project vicinity. Therefore, no impact is anticipated.

IV e) **Less Than Significant Impact:** The San Bernardino County Native Plant Protection policy (1989) provides protection for all trees greater than 6 inches diameter at breast height (dbh), smoke trees, mesquite, creosote rings, and all plants in the agave family, including Joshua trees. The project is not anticipated to conflict with any local policies or ordinances protecting native plants or other biological resources because the site is predominately devoid of any vegetation. Therefore, impacts are anticipated to be less than significant.

IV f) **Less Than Significant Impact.** The Project area is located in the Northern and Eastern Mojave planning area of the California Desert Conservation Area (CDCA). Compliance with mitigation measures BIO-1 through BIO-7 ensures that the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. The site is predominately devoid of any vegetation. Therefore, impacts are anticipated to be less than significant

<i>ISSUES</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
V. CULTURAL RESOURCES - Would the project				

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

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

V a-d **Less Than Significant with Mitigation Incorporated.** Information on cultural resources is included in the BLM's EA (See Appendix B). A records search of the California Historic resources Information System (CHRIS) revealed no cultural resources within a one-mile radius of the proposed project area. A review of the Sacred Lands Index on file with the Needles Field Office revealed no areas of traditional or sacred Native American values within the project area.

An archaeological survey of the proposed mill site was conducted on September 8, 2010. Modern debris and mining equipment were observed, as well as a concrete structure associated with milling that may be over 50 years old. However, these items would not be affected by the proposed activities and would not result on impacts to historic properties.

Although there is a potential of buried historic and/or paleontological resources, the likelihood is extremely low and, therefore, no monitoring for historic or paleontological resources is recommended. If, at any time, there is evidence of human remains (or possible human remains) are identified, the County Coroner must be notified within 24 hours and the area avoided until the Coroner can assess the remains. If the remains are identified as Native American in origin, the Coroner will contact the Native American Heritage Commission and the Most Likely (Native American) Descendant (MLD) will be identified. In consultation with the MLD, Coroner, Archaeological Consultant, project proponent, and Lead Agency, the disposition of the remains will be determined.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval to reduce these impacts to a level below significant:

MM# Mitigation Measures

CR-1 The project is not expected to have an impact on cultural or paleontological resources. However, the following procedures shall be implemented in the event that potentially sensitive cultural resources are uncovered during earthmoving. The developer/property owner shall submit a letter to County Planning agreeing to adhere to the following requirements and shall include a note on the grading plans and in all construction contracts/subcontracts a provision that the project contractors shall also adhere to the following requirements:

- **In the event archaeological, paleontological and/or historical resources, including pottery, middens or human remains, are uncovered during earthmoving activities, all work in that area shall cease immediately and a qualified archeologist shall be retained to access the findings, and if necessary provide appropriate disposition of the resources. Earthmoving shall be diverted temporarily around the deposits until they have been evaluated, recorded, excavated, and/or recovered as necessary. Earthmoving shall**

be allowed to proceed on the site when the archaeologist, in consultation with the appropriate Native American Tribe(s) and the County of San Bernardino Museum, determines the resources are recovered to their satisfaction.

- If possible human remains are encountered during any earthmoving activities, all work shall stop in the area in which the find(s) are present, and the San Bernardino County Coroner must be notified. State law dictates that the Native American Heritage Commission (NAHC) shall be notified in the event that remains are determined to be human and of Native American decent, in accordance with California Public Resources Code Section 5097.98.

ISSUES	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
VI. GEOLOGY AND SOILS - Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (2001) creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION (Check if project is located in the Geologic Hazards Overlay District):

VI a) **Less Than Significant Impact.**

ai) **Less Than Significant Impact.** The site is not located within an Alquist-Priolo Earthquake Fault

Zone according to maps prepared by the State Geologist.

aii) **Less Than Significant Impact.** Seismic ground shaking is influenced by the proximity of the site to an earthquake fault, the intensity of the seismic event, and the underlying soil composition. The site is not located in the vicinity of an earthquake fault and the project site is to be used for a mining operation and does not contain habitable structures. Impacts are forecast to be less than significant.

aiii) **Less Than Significant Impact.** According to the County General Plan Hazards Overlay Map (CJDJ Cima), the site is not located in an area susceptible to liquefaction. As noted, the proposed project would not build permanent structures or construct facilities with foundations that could fail as a result of liquefaction during an earthquake. Therefore, this impact is considered less than significant.

aiv) **Less Than Significant Impact.** According to the County General Plan Hazards Overlay Map (CJDJ Cima), the site is not located in an area susceptible to landslides. Therefore, the project site would not be exposed to landslide hazard, and this impact would be less than significant.

VI b) **Less Than Significant Impact.** During the removal of the tailings, drainage will not be altered from existing conditions. The tailings are porous and heavy and are not susceptible to erosion. After removal of the tailings, the site will be re-graded to near the original contours as shown on the Reclamation Plan sheet. Sheet flow will drain towards the east and eventually enter the drainage that is located along the southeast portion of the site and continue downgradient. It is expected that the onsite runoff will eventually create its own natural drainage channels to the east. The site will also be stabilized through revegetation. Therefore, less than significant impact is anticipated.

VI c) **Less Than Significant Impact.** The proposed project is the removal and transport of iron ore tailings. The removal of the stockpiled tailing is not located in an area that is geologically unstable or would become unstable as a result of the removal of the stockpile.

VI d) **No Impact.** The Project Site is not located in an area which has been identified by the County Building and Safety Geologist as having the potential for expansive soils. No impact is anticipated.

VI e) **No Impact.** Septic tanks and/or alternative water supply systems are not proposed as part of the proposed project. Therefore, no impacts are anticipated.

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

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
VII GREENHOUSE GAS EMISSIONS - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

Greenhouse Gas Emissions Measures

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

The San Bernardino County GHG Emissions Reduction Plan, September 2011 (“GHG Plan”) presents a comprehensive set of actions to reduce the County’s internal and external GHG emissions to 15% below current levels by 2020, consistent with the AB 32 Scoping Plan.

The following analysis is based on the Governor’s Office of Planning and Research, Technical Advisory on CEQA and Climate Change.

a) **Less Than Significant Impact**

Identify Greenhouse Gas Emissions:

Project-generated GHG emissions were based on Off-Road Mobile Source Emissions Factors (2012) and Emission Factors for On-Road Heavy-Heavy Duty Diesel Trucks (Emfac 2012 and are shown in Table 3.

**Table 3
 Greenhouse Gas Emissions
 Beck Mine Mill Site Reclamation Activities**

Task	CO ₂ ¹	CH ₄ ¹	N ₂ O ²
Water Truck (lbs)	7,380	0.6	0.0
Scraper/Grader (lbs)	31,440	3.6	0.0
Other Material Handling Equipment (lbs)	16,920	3	0.0
Total Per Year (lbs)	55,740	7.2	0.0
MTCO ₂ e	27.3	0.003	0.0
Total Reclamation Activities MTCO₂e	27.3		
County Threshold (MTCO ₂ e)	3,000		
Significant (Yes/No)	No		

Note: Assumes a worst case 15-day Reclamation Process.
 1 Off-Road Mobile Source Emissions Factors (2012);
 Emission Factors for On-Road Heavy-Heavy Duty Diesel Trucks (Emfac 2012)
 2 California Climate Action Registry General Reporting Protocol, 2009I;
 Table A9-8-C SCAQMD Handbook; Climate Leaders EPA, Section 3, Table 2.

Determine Significance:

As shown in Table 3, GHG emissions are not anticipated to exceed the County’s 3,000 MTCO₂e threshold. Therefore a less than significant impact is anticipated.

Mitigate Impacts

The project emissions are less than significant. However, the applicant will be required to implement

GHG reduction performance standards. The GHG reducing performance standards were developed by the County to improve the energy efficiency, water conservation, vehicle trip reduction potential, and other GHG reducing impacts from all new development approved within the unincorporated portions of San Bernardino County. As such, the following Performance Standards establish the minimum level of compliance that development must meet to assist in meeting the 2020 GHG reduction target identified in the in the County GHG Emissions Reduction Plan. These Performance Standards apply to all Projects, including those that are emit less than 3,000 MTCO2e per year, and will be included as Conditions of Approval for development projects.

The following are the Performance Standards (Conditions of Approval) that are applicable to the Project:

1. The “developer” shall submit for review and obtain approval from County Planning of a signed letter agreeing to include as a condition of all construction contracts/subcontracts requirements to reduce GHG emissions and submitting documentation of compliance. The developer/construction contractors shall do the following:

a) Select construction equipment based on low GHG emissions factors and high-energy efficiency. All diesel/gasoline-powered construction equipment shall be replaced, where possible, with equivalent electric or CNG equipment.

b) All construction equipment engines shall be properly tuned and maintained in accordance with the manufacturers specifications prior to arriving on site and throughout construction duration.

c) All construction equipment (including electric generators) shall be shut off by work crews when not in use and shall not idle for more than 5 minutes.

b) **Less Than Significant Impact.** The state and local regulatory programs for GHG emissions and climate change are described in the response to Question VIIa above. The performance standards described above will ensure that there would be no conflict with any applicable plan, policy, or regulation; therefore, impacts would be less than significant, and no mitigation would be required.

ISSUES	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
VIII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- h) 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?

SUBSTANTIATION

VII a/b **Less Than Significant Impact.** The Proposed Project involves the use of materials common to the mining industry and includes the transport, storage and use of fuels, and lubricants. The operator would continue to comply with all applicable federal and state safety rules and regulations regarding hazardous materials. Equipment will be fueled and maintained at the Beck Mine processing plant and all used oils, fuels and solvents will be collected in accordance with the Department of Toxic Substances and Control regulations and picked up by an approved hauler for recycling. To protect soils and groundwater from potential contamination, fueling and maintenance areas at the Beck Mine plant shall be constructed on impervious materials or covered with impervious materials and equipped with berms and catch basins to capture accidental spills.

The operator will be required to maintain its Business Emergency Contingency Plan with the County Fire Department Hazardous Materials Division. Therefore, the removal of the tailing stockpile would not create a significant hazard to the public from release or routine transport of hazardous materials. Less than significant impact is anticipated.

VIII c) **Less Than Significant Impact.** The Proposed Project involves the use of materials common to the mining industry and includes the transport, storage and use of fuels, and lubricants. The operator would continue to comply with all applicable federal and state safety rules and regulations regarding hazardous materials. During operation, diesel exhaust would be generated by heavy construction equipment; however, no school facilities or proposed school facilities are located within one-quarter mile radius of the Project Site. Therefore, less than significant impact is anticipated.

VIII d) **Less than significant impact.** The Project Site is not identified on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The operator would comply with all applicable federal and state safety rules and regulations regarding hazardous materials. Therefore, less than significant impact is anticipated.

- VIII e/f) **No Impact.** As shown on San Bernardino County General Plan, Hazards Overlay Map CJDJB-Cima, the Project Site does not occur within an airport influence area. Therefore, the Proposed Project would not result in safety hazard impacts from aircraft-related uses. No impact is anticipated.
- VIII g) **No Impact.** Activities associated with the Proposed Project would not impede existing emergency response plans for the Project Site and/or other land uses in the project vicinity. All vehicles and stationary equipment would be staged off public roads and would not block emergency access routes. Therefore, implementation of the Proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. No impact is anticipated.
- VIII h) **No Impact.** As shown on San Bernardino County General Plan, Hazards Overlay Map CJDJB, the Project Site does not occur within a Fire Safety Overlay District. Therefore, the Proposed Project would not result in any safety hazard impacts from wild fires. No impact is anticipated.

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

<i>ISSUES</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
IX. HYDROLOGY AND WATER QUALITY - Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level, which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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| g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structure that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION

- IX a) **Less Than Significant Impact.** During the removal of the tailings, drainage will not be altered from existing conditions. The tailings are porous and heavy and are not susceptible to erosion. After removal of the tailings, the site will be re-graded to near the original contours as shown on the Reclamation Plan sheet. Sheet flow will drain towards the east and eventually enter the drainage that is located along the southeast portion of the site and continue downgradient. It is expected that the onsite runoff will eventually create its own natural drainage channels to the east. The site will also be stabilized through revegetation. All storm water discharge is regulated by the Colorado River Basin Regional Water Quality Control Board pursuant to site specific Storm Water Pollution Prevention Plans. Less than significant impact is anticipated.
- IX b/f) **Less Than Significant Impact.** There are no water requirements for processing or washing the material. Water for dust control will be from the Beck Spring located at the Beck Mine process plant. It is anticipated approximately 6,000 to 8,000 gallons of water per day will be required for mill site operations and the control of dust on the access road. A 2,000 gallon water truck will be used for dust control on roads and during scraping as needed. Domestic water for drinking will be imported for employees. Domestic wastewater and septage will be portable and will be collected and removed by a licensed operator. Less than significant impact is anticipated.
- IX c/d/e) **Less Than Significant Impact.** During the removal of the tailings, drainage will not be altered from existing conditions. The tailings are porous and heavy and are not susceptible to erosion. After removal of the tailings, the site will be re-graded to near the original contours as shown on the Reclamation Plan sheet. Sheet flow will drain towards the east and eventually enter the drainage that is located along the southeast portion of the site and continue downgradient. It is expected that the onsite runoff will eventually create its own natural drainage channels to the east. The site will also be stabilized through revegetation. Less than significant impact is anticipated.
- IX g/h) **No Impact.** The Proposed Project does not occur within a 100-year flood plain, nor does it include the construction of housing or would place housing within a flood plain. No impacts are anticipated.
- i) **No Impact.** The Project Site and surrounding area is located outside of any designated dam inundation area. The Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, as no levee or dam is proposed as part of the his project. Therefore, no impacts are anticipated.
- j) **No Impact.** A seiche is an oscillating surface wave in a restricted or enclosed body of water generated by ground motion, usually during an earthquake. Inundation from a seiche can occur if the wave overflows a containment wall or the banks of a water body. As the Project Site is not located adjacent to any body of water that has the potential of seiche or tsunami, no impacts are anticipated.

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

ISSUES	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
X. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION

- X a) **No Impact.** The Project Site is surrounded by open space lands. The Proposed Project is consistent with the County General Plan and would not physically divide an established community. No impact is anticipated.
- X b) **No Impact.** The Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project as the project is consistent with all applicable land use policies and regulations of the County of San Bernardino General Plan. No impact is anticipated.
- X-c) **Less Than Significant Impact.** The Project area is located in the Northern and Eastern Mojave planning area of the California Desert Conservation Area (CDCA). Compliance with mitigation measures BIO-1 through BIO-7, ensures that the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

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

ISSUES	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
XI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

XI a-b) **No Impact.** The State’s Guidelines for Classification and Designation of Mineral Lands help implement SMARA by providing the State Geologist with direction in carrying out mineral resource classification of lands in California that are threatened by uses that will be incompatible with, or will preclude quarrying. In addition, these guidelines describe how the State Mining and Geology Board (SMGB) may elect to designate mineral-bearing areas of statewide or regional significance.

Classification is the process of identifying lands containing significant mineral deposits. Designation is the formal recognition by the SMGB, after consultation with lead agencies and other interested parties, of areas containing mineral deposits of regional or statewide significance. The objective of classification and designation processes is to ensure, through appropriate lead agency policies and procedures, that mineral deposits of statewide or of regional significance are available when needed. Classification is completed by the State Geologist in accordance with the SMGB’s priority list, into Mineral Resource Zones (MRZ). Classification is based on geologic and economic factors without regard to existing land use and land ownership. Within the classifications, “MRZ-2” is defined as areas that contain identified mineral resources.

The California Department of Conservation Division of Mines and Geology has not mapped the site. However, mining claims have been issued for the iron ore deposits. The Proposed Project would supply iron ore to the region. Therefore, the Proposed Project would not result in the loss of availability, however, would provide a mineral resource that would be of value to the region and the residents of the State. Therefore, no impacts are anticipated.

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

<i>ISSUES</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
XII. NOISE - Would the project:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

SUBSTANTIATION (Check if the project is located in the Noise Hazard Overlay District or is subject to severe noise levels according to the General Plan Noise Element):

XII **No Impact.** Approval of the project would require operations to conform to all applicable noise control regulations. There are no nearby noise sensitive land uses within the vicinity of the Project Site. Therefore, no impacts are anticipated.

XII b) **Less Than Significant.** Approval of the project would require operations to conform to all applicable noise control regulations. There are no nearby noise sensitive land uses within the vicinity of the Project Site. Removal of the tailings would not expose persons to or generation of excessive groundborne vibration or groundborne noise levels. Therefore, less than significant impact is anticipated.

XI e/f) **No Impact.** The Project Site is not located within an airport land use plan nor within two miles of a public airport or public use airport, or within the vicinity of a private airstrip, that would expose people at the Project Site to excessive noise levels. Therefore, impacts from airport-related noise are not anticipated.

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

ISSUES	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant	No Impact
XIII. POPULATION AND HOUSING - Would the project:				

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| 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION

XIII a) **No Impact.** The Proposed Project would not induce substantial population growth in the area either directly or indirectly because the proposed project consists of a mining operation that will operate with one and sometimes two equipment operators working a single daytime shift. In addition, the duration of the operation is approximately 10 years after which time the site will be reclaimed and returned to open space use. No impacts are anticipated.

XIII b) **No Impact.** The proposed use would not displace substantial numbers of existing housing units, or require the construction of replacement housing, as no housing units are proposed to be

demolished as a result of this project. No impacts are anticipated.

- XIII c) **No Impact.** Implementation of the Proposed Project would not displace substantial numbers of people necessitating the construction of replacement housing elsewhere, as no housing exists at the Project Site.

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

<i>ISSUES</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
XIV. PUBLIC SERVICES				

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

Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION

- XIV a) **No Impact.** The Proposed Project would not result substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, or hinder acceptable service ratios, response times or other performance objectives for any of the public services, including fire and police protection, schools, parks or other public facilities because the Project consists of a mining operation on a 20 acre site with no permanent improvements proposed. After mining operations, the site would consist of vacant land. Therefore, no impacts are anticipated. Therefore, no impacts are anticipated.

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

<i>ISSUES</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
XV. RECREATION				

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational

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| facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION

XV **No Impact.** Approval of the Proposed Project would not generate the need off new jobs or housing a/b) which would induce population growth in adjacent areas, and ultimately increase the use of park facilities or other recreational facilities in the region. No impacts are anticipated.

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

<i>ISSUES</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
XVI. TRANSPORTATION/TRAFFIC - Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION

- XVI a-b) **Less Than Significant Impact.** The Proposed Project would be mined at a maximum 400,000 TPY of ore which would provide reserves for up to 10 years. The Applicant is requesting a 10-year operations plan or until year 2023. The operator will operate 7 days a week for 365 days a year with an average of 51 truck trips per day. An increase of approximately 51 trips per day would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections), or exceed, either individually or cumulatively, a level of service standard. Impacts would be less than significant.
- XVI c) **No Impact.** Approval of the tailings removal would not affect air traffic patterns at any airport or airstrip. No impacts are anticipated.
- XVI d) **No Impact.** Removal of the tailings would not affect public streets. The overall production rate of 400,000 TPY would result in 51 trips per day. The additional truck trips do not involve any road developments or design features that could substantially increase hazards on public roads. Therefore, less than significant impact is anticipated.
- XVI e/g) **No Impact.** Activities associated with the Proposed Project would not impede existing emergency response plans for the Project Site and/or other land uses in the project vicinity. All vehicles and stationary equipment would be staged off public roads and would not block emergency access routes. In addition, no road closures would be required. The Proposed Project would not involve any long-term increase in traffic that would conflict with adopted policies, plans, or programs supporting alternative transportation. No impacts would result.

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

ISSUES	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
XVII. UTILITIES AND SERVICE SYSTEMS - Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

commitments?

- f) Be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?

SUBSTANTIATION

- a/e) **No Impact.** The Proposed Project would not require sewer collection or treatment services and therefore no off-site discharge of treated wastewater would occur. No impacts related to wastewater treatment are anticipated.
- b/d) **No Impact.** Water will be used for dust control measures only. Water will be applied to the working areas and material transfer points. Water is not available at the site and will be hauled from the Beck Spring located at the Beck Mine process plant. It is anticipated approximately 6,000 to 8,000 gallons of water per day will be required for mill site operations and the control of dust on the access road. A 2,000 gallon water truck will be used for dust control on roads and during scraping as needed. Domestic water for drinking will be imported for employees. Therefore, no impacts related to expanding a water treatment or distribution system would occur.
- c) **Less Than Significant Impact.** Due to the lack of fine surface material and low rainfall (less than 4 inches/year) the site has little potential for erosion and sedimentation. The project site is covered with a stockpile of porous, heavy iron ore tailings. It is not expected that any erosion or sedimentation will occur at the tailings site due to the very heavy and larger sized iron ore tailings onsite. Drainage will remain similar to its existing conditions. Less than significant impact is anticipated.
- f, g) **No Impact.** All material will be used. Negligible amounts of waste rock are anticipated. The mining process uses water for dust control measures only. This water will evaporate and will not create any wastewater or any need for ponds. Equipment maintenance will be done onsite. Waste oil, lubricants and solvents will be removed from the site and disposed of at permitted facilities. All refuse will be kept in closed containers and removed from the site to permitted facilities as needed. No trash will be allowed to collect on the site. No impact is anticipated.

ISSUES	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorp.</i>	<i>Less than Significant</i>	<i>No Impact</i>
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to 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, 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

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| the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

a) **Less Than Significant Impact With Mitigation Incorporated.** Based on the analysis contained in this Initial Study, impacts to Aesthetics, Agriculture and Forestry Resources, Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Transportation and Traffic, are considered as having a less than significant or no impact on the environment.

The results of the Initial Study show that there are potentially significant impacts to Biological Resources and Cultural Resources These impacts will be reduced to less than significant after incorporation of mitigation measures.

Therefore the Project will not degrade the quality of the environment and no habitat, wildlife populations, or plant and animal communities would be impacted.

b) **Less Than Significant Impact.** None of the proposed mining activities would substantially contribute to any cumulatively significant impact on the evaluated resources. The proposed project would not result in any unmitigated adverse project effects on air quality, biological resources, drainage, or water quality, and there would be no contribution to any cumulatively considerable impacts in these issue areas. There would be no long-term loss of agricultural or forestry resources or loss of availability of a mineral resource of value to the state, region, or locally, so there would be no cumulative effect. The project would involve reclamation of the project site for open space. There would not be an adverse change in scenic value or visual quality or noise levels that could contribute to a cumulative impact. No impacts on services or utility systems would occur as a result of project implementation that could combine with cumulative effects in the area surrounding the project.

In addition, The analysis in this Initial Study Checklist demonstrated that the Project is in compliance with all applicable regional plans including but not limited to, water quality control plan, air quality maintenance plan, and plans or regulations for the reduction of greenhouse gas emissions. Compliance with these regional plans serves to reduce impacts on a regional basis so that the Project would not produce impacts, that considered with the effects of other past, present, and probable future projects, would be cumulatively considerable.

c) **Less Than Significant Impact With Mitigation Incorporated.** As discussed this Initial Study Checklist, the Project would not expose persons to adverse impacts related to Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Population and Housing, or Transportation/Traffic hazards. These impacts were identified to have no impact or a less than significant impact.

The implementation of the Mitigation Measures identified in this Initial Study Checklist would result in a less than significant impact and there would be no substantial adverse effects on human beings, either directly or indirectly

GENERAL REFERENCES

CEQA Guidelines, Appendix G.

County of San Bernardino General Plan, 2007

County of san Bernardino Development Code, 2007

County of San Bernardino Greenhouse Gas Emissions Reduction Plan, September 2011

Mojave Desert Air Quality Management District California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, August 2011.

APPENDICIES

- A. Reclamation Plan [including approved Plan of Operations (POO)]
- B. BLM Decision Record and Environmental Assessment (EA)