CITY OF CALIFORNIA CITY

PLANNING DEPARTMENT

DIRECTOR'S HEARING STAFF REPORT

Major Site Plan Review SPR 26-08 | Hyundai-Kia Equipment Storage Building

DIRECTOR'S HEARING | NOVEMBER 5, 2026

Item	Record / proposal
Hearing date	Thursday, November 5, 2026 - 10:00 a.m. Pacific Time (PST); via Zoom, Meeting ID 859 5288 4265 JOIN ONLINE: https://us06web.zoom.us/j/85952884265
To	Planning Director, City of California City
From	Planning Department
Applicant / agent	Jose Guerrero, Superior Construction, for Hyundai-Kia America Technical Center Inc.
Site	5759 Highway 58, California City, California; APN 235-243-01
Land use	Light Industrial and Research; M-1
Requested action	Major Site Plan Review for 7,200-sf equipment storage building and associated improvements

PUBLIC HEARING: Thursday, November 5, 2026 | 10:00 a.m. PST | Join Zoom: https://us06web.zoom.us/j/85952884265 | Meeting ID: 859 5288 4265

RECOMMENDATION

Staff recommends that, after the November 5, 2026 public Director's Hearing and consideration of comments, the Planning Director (1) consider the certified 2002 EIR and 2003 Addendum No. 1 with the October 14, 2026 project-specific CEQA Consistency Memorandum and supporting record; (2) adopt written findings under CEQA Guidelines section 15162 that no subsequent environmental document is required, if supported by the completed City record; and (3) approve SPR 26-08 subject to Attachment A, Planning Conditions of Approval. The draft determination in this packet is proposed for review only.

1. PROJECT DESCRIPTION

The applicant proposes a one-story 7,200-square-foot metal Equipment Storage Building (120 x 60 feet), a 2,256-square-foot mezzanine, approximately 2,400 square feet of exterior canopy, parking, internal access, grading, drainage, utility connections, and a septic system within the developed California Proving Ground operations compound. The revised Site Plan Review application identifies S-1 equipment storage and eight parking spaces (seven standard and one accessible).

The October 14, 2026 memorandum describes storage of tools, building-maintenance inventory, and heavy equipment now kept outdoors or in containers. It reports no vehicle testing or deliveries, one additional employee, operating hours of 6:00 a.m. to 5:00 p.m., two restrooms and one sink, down-directed LED lighting, and approximately 10 gallons each of engine oil and hydraulic fluid. These are applicant-supplied project characteristics documented by its consultant; the City evaluates them in the context of the full record.

The accompanying construction information lists approximately 1,879 cubic yards of grading, up to 10 construction workers, on-site water for dust control, no import/export, no demolition, and no off-site work. The developer describes construction during August 2026 through January 2027. These are not independent construction certifications.

2. PROJECT SITE AND BACKGROUND

The proposed equipment-storage building is located within the existing Hyundai proving-ground developed compound. The site lies within the geographical and operational setting evaluated in the certified EIR (SCH No. 2002041025). The proposed 7,200-square-foot building, mezzanine, canopy, parking, utilities and associated ground disturbance are evaluated in this report under the existing environmental record and project-specific biological documentation.

The signed application and project plans consistently identify an Equipment Storage Building. Earlier biological working documents use different facility terminology; the City relies on the current project description and limits the proposed entitlement to equipment storage and accessory support functions.

3. ZONING AND SITE PLAN REVIEW

The California City Municipal Code supplies the land-use nexus: M-1 permits research and development facilities (§9-2.2101(d)); the Hyundai proving ground is an established testing/research operation evaluated in the certified 2002 EIR (SCH No. 2002041025) and 2003 Addendum No. 1. Storage of tools, building-maintenance parts and heavy equipment is accessory to that operation, not a separate contractors' storage yard. The signed equipment-storage application and the 2026 site plan identify the building, mezzanine, canopy and proposed parking. Planning evaluates the permitted accessory use and the §9-2.212 entitlement. The Building Department (Joe Barragan) shall verify the required/provided parking, applicable floor-area classification, accessible-space arrangement and dimensional compliance against the controlling approved plans and applicable code. Engineering/Public Works shall verify civil plan control, setbacks as surveyed, grading, access, drainage and utilities under their separate review. These are departmental technical verifications, not additional CEQA studies or Planning resubmittals. Planning shall incorporate any material zoning issue formally identified by the responsible reviewer before the Director makes the §9-2.212(d) determination; the City does not grant any parking or other variance by this review.

Planning topic	**Submitted record**	**Planning analysis / conditions**
Use / scope	7,200-sf equipment-storage building with 2,256-sf	Storage and accessory support use only; PL-01 to PL-03.

	mezzanine and 2,400-sf exterior canopy; accessory to existing proving-ground operations.	
Off-street parking	Municipal Code §9-2.208(b)(25): storage/warehouse use, 1 space per 1,000 sf of floor area. 7,200 sf = 8 spaces (rounded up); including 2,256-sf mezzanine = 9,456 sf, or 10 spaces (rounded up). Submitted plan depicts 8 spaces (7 standard + 1 accessible).	The eight-space count is shown on submitted drawings. Whether mezzanine floor area counts for parking purposes is not established by the record; no parking reduction or waiver is granted; PL-04 and PL-06.
Building dimensions	Building 120 x 60 ft; height about 24 ft 6 in; mezzanine 2,256 sf and canopy 2,400 sf.	Authorized scope as depicted on controlling drawings; PL-02 and PL-03.
Access / layout	Internal circulation and access are shown within the existing proving-ground compound.	Applicable City access and site standards remain in effect; PL-06.
Landscape / water efficiency	Parking and landscape areas appear on submitted site drawings; actual new landscaped area not quantified in the evidence reviewed.	Apply City landscape standards and MWELO when triggered; PL-09 and PL-10.
Screening / exterior storage	Equipment previously stored outdoors; project includes canopy	Authorize only shown storage locations; screening where code requires; PL-08
Lighting / noise	LED downlighting; HVAC/compressor reported as 55 dBA at unit	Shielding and operating compatibility; PL-11, PL-12
Biology / disturbance	Oct 13 biological letter and revised impact overlay	Incorporate October memorandum VMF measures; PL-15 to PL-24
Drainage / septic / fire	Site plans and infrastructure details described in the project record	Engineering/Public Works, Building and Fire retain separate technical approvals; PL-28, PL-29.
Off-street loading / exterior storage	Storage building exceeds 5,000 sf; accessory outdoor areas	The applicable loading and storage code provisions remain in effect; this Planning

	identified in plan record	action grants no technical approval or waiver.

4. EXISTING SITE AND PROJECT CONTEXT

The equipment-storage building is proposed within the developed support area of the existing Hyundai proving ground. It is intended to support existing facility operations rather than establish a separate testing use. The environmental review considers the project as described in the application and supporting studies, including relevant cumulative effects.

5. SCOPE OF PLANNING REVIEW

This report evaluates the Major Site Plan Review request for land-use consistency, applicable site development standards, and environmental review. Separate technical permits and approvals are governed by their respective requirements and are not granted by this Planning decision.

6. ENVIRONMENTAL REVIEW (CEQA)

The City certified the Final EIR for the Redevelopment Area Expansion, Detachment, Annexation, and Automotive Test Course Project, SCH No. 2002041025, on October 22, 2002, and the record includes Addendum No. 1 dated October 16, 2003 and an adopted mitigation program. Mark Hagan, a biologist retained by Hyundai, prepared the October 14, 2026 CEQA Consistency Memorandum and October 13 biological evaluation, with revised disturbance exhibits. The City may rely on competent applicant-submitted technical evidence while exercising its independent judgment as lead agency.

The October 13 evaluation documents biological visits July 14 and August 26, 2026, identifies Joshua trees approximately 45 to 50 feet south of the construction site, describes a 40-foot ground-disturbance avoidance measure, and reports no suitable nearby habitat for certain previously studied species or desert washes. The October 9 site overlay shows utility routes, staging, grading, septic and tree-protection features. The October memorandum includes VMF-0 through VMF-10 measures. The City should retain the survey, final mapping, construction-limits exhibit, and worker education materials with its record.

The City is the CEQA lead agency and makes its own findings based on the record, rather than adopting provisional language in the October 14, 2026 consultant memorandum. The signed equipment-storage SPR application and submitted plans establish the proposed use; applicant construction and operations information describes one additional employee, no new testing or deliveries, work within an existing developed compound, approximately 1,879 cubic yards of grading, two restrooms and a sink served by septic, and limited motor and hydraulic oil storage. The signed October 13 biological evaluation and accompanying disturbance and Joshua tree exhibits support evaluation of species avoidance and site protections, subject to applicable existing EIR mitigation measures and the enforceable conditions herein.

On that independent project-specific record, staff recommends that the Director find no §15162(a)(1)-(3) trigger requiring major revisions to the certified EIR and that a separate subsequent EIR is not required. The recommendation relies on the restricted accessory-storage scope, previously developed campus context, no newly identified significant effect, and enforceable avoidance and continuing mitigation. Disturbance must remain inside the mapped limits; no western Joshua tree take is authorized. If the Director determines the 2026 building facts are a necessary addition to the old EIR rather than only an application-level consistency explanation, the City should treat Attachment C as its documented addendum/§15164(e) explanation and consider it together with the certified EIR before approving; counsel may confirm the document label. This is a City finding for SPR 26-08, not an endorsement of all of Mark's forward-looking statements.

7. APPLICABLE DEVELOPMENT STANDARDS

California Model Water Efficient Landscape Ordinance (23 CCR sections 490 et seq.) generally applies to new construction projects containing at least 500 square feet of landscape area that require covered approvals (23 CCR section 491). The record does not state the proposed qualifying landscaped square footage. Before approving any landscape work, Planning will document the threshold decision. When triggered, the applicant must use the lawful applicable documentation and design option; 23 CCR section 491.2 addresses prescriptive/performance pathways for areas between 500 and 2,500 square feet and performance for 2,500 square feet or more. Existing non-rehabilitated landscape and any local implementing ordinance require separate treatment as applicable.

The decision also preserves applicable state requirements for species protection, cultural and tribal resources, stormwater, waste handling, air-quality measures, hazardous materials and construction change control. Independent technical agencies administer their own permits and statutory responsibilities.

OTHER APPLICABLE MUNICIPAL CODE STANDARDS

Off-street loading (section 9-2.211). The building exceeds 5,000 square feet; applicable off-street loading provisions are preserved. The available plan record is referenced without representing that Planning has certified the civil dimensions or approved a loading exception. No exception is granted by this report.

Exterior storage and screening (section 9-2.214). This approval is for indoor equipment storage and only expressly shown accessory outside areas; it does not independently authorize a new open storage yard. Screening requirements, including those triggered by actual adjacency and exterior storage activities, remain enforceable through PL-08 and PL-13.

Parking-area landscaping and water efficiency (sections 9-2.209 and 9-2.214; 23 CCR sections 490 et seq.). Applicable parking-area and site landscaping standards remain enforceable. The record does not identify the proposed new landscaped area; the Model Water Efficient Landscape Ordinance applies if its qualifying threshold is met, rather than by treating building floor area as landscape area. Building/Engineering administer the physical layout, and Planning administers applicable landscaping and aesthetic conditions.

Scope of this action. This Site Plan Review determines Planning land use and CEQA consistency. Parking dimensions, building-code matters, civil engineering, utility systems, septic requirements, and fire protection are subject to their separate approvals. This report does not purport to direct, replace, or certify those processes.

8. RECOMMENDED FINDINGS AND ACTION

The City has scheduled its customary public Director’s Hearing for Thursday, November 5, 2026, at 10:00 a.m. Pacific Time via Zoom (Meeting ID 859 5288 4265). The Director will consider the staff report, environmental record, proposed conditions, and any oral or written comments received before taking action. Hyundai confirmed by email on October 29, 2026 that it had no corrections to the circulated packet.

9. ATTACHMENTS

- Attachment A - Planning Conditions of Approval (32 conditions, with compliance timing).
- Attachment B - Proposed Director's Determination (for action at the hearing).
- Attachment C - CEQA Consistency and Section 15162 Findings.

ATTACHMENT A | PLANNING CONDITIONS OF APPROVAL

SPR 26-08 | Hyundai-Kia Equipment Storage Building

These conditions govern the Planning entitlement. They bind the owner, applicant, operators, successors and assigns where applicable. Departmental technical conditions are administered separately. The City may make non-substantive renumbering or timing corrections at adoption; material changes require review.

PL-01. Approved plans. Development shall substantially conform to the final dated and identified Planning-approved site plan and building exhibits accepted by the Director. No unidentified alternate sheet or working overlay supersedes the approved plan.

PL-02. Limited approved use. The authorized activity is equipment storage and directly accessory building support as identified in the application and October 14, 2026 memorandum. No new standalone vehicle testing, repair, manufacturing, or materially different use is approved.

PL-03. Mezzanine and canopy. The 2,256-sf mezzanine and approximately 2,400-sf canopy are included in the approved scope. No additional enclosure, storage expansion, or outdoor activity is approved except as depicted on the controlling plans.

PL-04. No waiver. Approval grants no variance, density or parking adjustment, deviation, code exception, or waiver. All relevant Municipal Code requirements remain in force.

PL-05. Approved layout and dimensional compliance. Development shall conform to the controlling approved plan and applicable M-1 zoning requirements. This Planning approval does not approve technical design or civil drawings. Any material change to the approved land-use scope or site configuration is subject to further Planning review as applicable.

PL-06. Parking and access. The project shall maintain the off-street parking and access required by applicable City regulations and independently approved plans. This condition does not modify or waive the applicable parking standard or replace separate Building or engineering approvals.

PL-07. Access, circulation and loading. Approved internal circulation, pedestrian access, emergency access, and applicable off-street loading areas shall remain available and unobstructed. Municipal Code section 9-2.211 applies to the extent required by its terms; this approval grants no loading exception.

PL-08. Screening / storage. Exterior equipment, refuse, pallets, containers, inventory and related items may be located only in Planning-approved exterior areas and shall be screened where required under section 9-2.214 and other applicable code provisions. Interior storage is limited to applicable occupancy and fire limits.

PL-09. Waste and housekeeping. Maintain an orderly site and approved refuse and waste-material locations. No outdoor accumulation of debris, unapproved containers or hazardous wastes is permitted.

PL-10. Landscape water-efficiency applicability. Any new or rehabilitated landscape areas shall comply with the City's applicable landscape requirements and the California Model Water Efficient Landscape Ordinance when the applicable thresholds are met. This condition does not presume a qualifying landscape area not documented in the submitted plans.

PL-11. Exterior lighting. All exterior fixtures shall be shielded, directed downward, controlled to minimize off-site spill and protected-resource exposure, and comply with City standards and applicable EIR mitigation.

PL-12. Noise and operation. Operate in accordance with the documented equipment-storage use, hours, and proposed equipment. Material changes to deliveries, mechanical or operational noise, nighttime activity, staffing, testing or other use intensity shall be reviewed by Planning for entitlement and CEQA implications.

PL-13. Adjoining property compatibility. Comply with any applicable district boundary setback, wall, screening and glare requirements where actually triggered by adjoining parcels or uses; no adjacency to a residential district is presumed.

PL-14. Approved surface treatments. Site improvements, paved areas, disturbed surfaces and visible storage shall be installed and maintained consistent with the approved plans and applicable site development standards.

PL-15. Prior EIR mitigation. Implement all mitigation measures and monitoring responsibilities in the certified 2002 EIR, 2003 Addendum No. 1 and adopted MMRP that remain applicable to this location and activity; this action does not supersede them.

PL-16. Consistency memorandum measures. Project-specific requirements VMF-1 through VMF-10 of the October 14, 2026 Consistency Memorandum are incorporated to the extent applicable and must be administered according to their stated timing and purpose.

PL-17. Disturbance limits. Before additional ground disturbance, the complete site work limits for building, canopy, grading, septic/leach field, drainage, utility trenching, roads, parking, washdown and staging shall be delineated on the accepted disturbance exhibit and marked in the field. No disturbance outside approved boundaries without Planning review.

PL-18. Qualified biological documentation. Retain the signed October 13 biological evaluation, Joshua tree location mapping and complete disturbance exhibit in the project record. Conduct any additional species-specific preconstruction surveys required by the applicable EIR mitigation, permits or law at the relevant stage.

PL-19. Joshua tree avoidance. Protect all western Joshua trees. The project biologist shall identify and mark the protection limits in the field before activities nearby; no trenching, soil disturbance, equipment storage, washout or materials placement within protection areas unless separately lawfully authorized. The October record references 40-foot avoidance and a separate 50-foot hazardous-substance protection practice; both apply for their stated activities, subject to more stringent law or permit terms.

PL-20. Other sensitive resources. Continue applicable desert tortoise, Mohave ground squirrel, burrowing owl, nesting bird, sensitive-plant and desert wash protection, surveys and monitoring consistent with certified EIR measures and current law.

PL-21. Worker education. Before employees or contractors work in biologically protected project areas, provide the required protected-species/environmental awareness instruction and maintain signed attendance records available to the City.

PL-22. Fencing / access. Maintain required field limits, tree-protection barriers and designated routes, parking and staging through the relevant construction period. Keep construction and fill within approved disturbance areas.

PL-23. Stop-work / discovery. Stop affected activities and notify appropriate agencies and the City when biological resources, archaeological resources or human remains are encountered, protection barriers are violated, or work extends beyond authorized limits. Resume only after required lawful clearance.

PL-24. No unauthorized take. No approval herein authorizes take of western Joshua trees or any other protected species. Obtain any required CDFW, federal or other agency authorization before conducting an activity requiring such authorization.

PL-25. Dust and air measures. Implement applicable EIR dust suppression and air-quality mitigation, and comply with current Eastern Kern Air Pollution Control District requirements. Sources, controls and equipment are administered through applicable agency rules.

PL-26. Erosion and wash protection. Perform approved site work and erosion control consistent with applicable EIR mitigation and agency-approved grading, drainage, stormwater and septic plans; do not encroach into protected washes without required review.

PL-27. Hazardous substances. Use and store only materials consistent with the documented storage use and applicable safety and environmental laws; prevent discharges, spills and soil contamination. A material change in quantities or activities requires Planning/CEQA change review as applicable.

PL-28. Departmental permits. Obtain and maintain all independent Building, Fire, Engineering, Public Works, health, utility and other jurisdictional authorizations and satisfy their separate conditions, plan checks and inspections. Planning approval is not a technical permit or certificate of occupancy.

PL-29. Building-code coordination. The project remains subject to applicable building-code review, inspections, deferred submittals, occupancy requirements, and any separately applicable technical approvals. The Planning entitlement does not replace those independent approvals.

PL-30. Construction compliance. The applicant shall make applicable Planning mitigation verification records, site photographs, survey findings and worker education documents available for City review and shall correct any Planning condition violation under applicable law.

PL-31. Change control. Any changed use, enlarged footprint, new off-site work, potential tree take, substantial operational increment, changed storage character or other material environmental/site plan change shall be submitted to Planning before implementation for the applicable SPR and CEQA review.

PL-32. Ongoing / enforcement. Maintain compliance with the approved development, conditions and applicable laws throughout operation. Violations are subject to remedies available to the City under law, including appropriate enforcement and modification proceedings.

Compliance timing

Stage	Conditions / requirements
Before further ground disturbance	PL-15 through PL-24, and applicable survey / marked limits / agency permits.
Final plan check / site works	PL-04 through PL-14, PL-25 through PL-29, as triggered.
During construction	All relevant EIR mitigation, environmental education, fencing, dust/erosion and project change controls.
Before occupancy	Applicable Planning improvements and all independently required agency clearances.
Ongoing operation	Authorized use, outdoor storage, lighting, maintenance, noise, change control and resource protections.

ATTACHMENT B | PROPOSED DIRECTOR'S DETERMINATION

DIRECTOR'S DETERMINATION NO. [TO BE ASSIGNED] | SPR 26-08 | NOT FOR SIGNATURE UNTIL RECORD COMPLETE

A DETERMINATION OF THE PLANNING DIRECTOR OF THE CITY OF CALIFORNIA CITY APPROVING MAJOR SITE PLAN REVIEW FOR THE HYUNDAI-KIA EQUIPMENT STORAGE BUILDING AT 5759 HIGHWAY 58, APN 235-243-01, SUBJECT TO FINDINGS AND CONDITIONS.

RECITALS

- The City received a Major Site Plan Review application identifying a 7,200-square-foot metal Equipment Storage Building, 2,256-square-foot mezzanine, approximately 2,400-square-foot canopy and associated site work within the existing Hyundai proving-ground compound.
- The property is designated and zoned Light Industrial and Research (M-1).
- The City previously certified the Final EIR for the Redevelopment Area Expansion, Detachment, Annexation, and Automotive Test Course Project (SCH No. 2002041025) on October 22, 2002, and has in its record Addendum No. 1 and an adopted mitigation program.
- The Director will consider the staff report, environmental record, applicable Planning Conditions of Approval and public comments received at the hearing before acting.
- The Director's action concerns the current Planning entitlement and environmental findings for the identified equipment-storage project. Independent technical approvals remain administered by the responsible departments.

SECTION 1. CEQA DETERMINATION

Upon review of the whole record and exercise of the City's independent judgment, the Planning Director finds the Equipment Storage Building, as described and conditioned, remains within the previously analyzed developed proving-ground area. The Director finds that no substantial project changes, substantially changed circumstances, or new information of substantial importance trigger a subsequent or supplemental environmental document under CEQA Guidelines section 15162. The basis includes the limited equipment-storage operation, location in a previously disturbed compound, October 2026 biological review, protected Joshua tree avoidance, ongoing applicable EIR mitigation, and incorporated project-specific environmental conditions. The October 14, 2026 memorandum is considered as a project-specific consistency document; the Director's written reasons for not preparing a subsequent EIR are further stated in Attachment C.

This finding is conditional on adoption of the defined project scope and enforceable conditions and does not authorize any separate facility, expanded footprint, protected-species take, or unreviewed activity.

SECTION 2. SITE PLAN REVIEW FINDINGS

1. The proposed indoor equipment storage is an accessory support use to the pre-existing approved automotive proving-ground research/development facility, permitted in M-1 by §9-2.2101(d). This SPR does not approve an independent contractors storage yard or a new testing use.
2. The use is equipment storage and related accessory functions serving the existing testing operation in the M-1 district, as identified on the approved application and project record.
3. The application and approved building drawings identify the 7,200-sf building, 2,256-sf mezzanine, 2,400-sf canopy, height of approximately 24 feet 6 inches, and eight depicted stalls. The approved accessory storage use is within the established proving-ground operations compound. The physical parking calculation and code-compliant layout, dimensional and civil plan verification are reviewed by Building and Engineering/Public Works in their respective administrative processes. This determination does not grant a

parking adjustment or certify an unverified calculation. Any identified material zoning inconsistency must be resolved through the appropriate City process before the Director adopts an affirmative §9-2.212(d) finding.

4. Applicable site design, screening, landscaping, parking, lighting and environmental requirements remain enforceable, with no variance or waiver granted.
5. The project is subject to the previously adopted and currently applicable environmental mitigation and the project-specific measures incorporated into Exhibit A, and does not authorize construction outside the approved disturbance area.
6. This Site Plan Review does not substitute for Building, Fire, Public Works, Engineering, environmental health, resource-agency permits, or an occupancy certificate.

SECTION 3. DIRECTOR ACTION

PROPOSED ACTION (NOT EFFECTIVE BEFORE HEARING): Upon consideration of the record and public comments, the Planning Director may APPROVE Major Site Plan Review SPR 26-08 for the Hyundai-Kia Equipment Storage Building, adopt the CEQA findings in this report and Attachment C, and adopt Attachment A (Planning Conditions of Approval), subject to the controlling project plan set. Any adopted decision and subsequent environmental notice shall reflect the action actually taken.

SECTION 4. APPEAL AND RECORD

The Director's Hearing will be held publicly on November 5, 2026 in accordance with City practice. Any appeal is governed by California City Municipal Code §9-2.212 and other applicable provisions, without creation of a new appeal period by this proposed decision. The application, plans, environmental record, hearing notice, comments, final written decision and conditions shall be maintained in the administrative record.

Public Director's Hearing: November 5, 2026, 10:00 a.m. Pacific Time. Determination date: [COMPLETE UPON ACTION]

Planning Director signature: _____ (upon action)

Record custodian: City of California City, Planning Department, 21000 Hacienda Boulevard, California City, CA 93505.

ATTACHMENT C | CEQA CONSISTENCY / SECTION 15162 FINDINGS

Equipment Storage Building | SCH No. 2002041025

1. Prior environmental documents

The previous environmental record comprises the October 22, 2002 certified EIR (SCH 2002041025) evaluating the automotive test course, its support/operations compound, access, parking, grading, utilities and biological impacts; October 16, 2003 Addendum No. 1; and the adopted mitigation monitoring program. The existing facility and developed operations compound are the prior-approval baseline. This 2026 SPR concerns an accessory indoor storage building within that operating compound. The City relies on those prior project approvals as environmental and use context, but does not infer that the historical EIR permanently waived current zoning parking or site-plan requirements.

2. Present action and evidence

The City has independently considered the signed equipment-storage SPR application; the 7,200-square-foot building, mezzanine and canopy plans; site plan; Hyundai operations and construction information; the October 13 biological evaluation; October 9 site disturbance and utility overlay; October 13 Joshua tree location R6 exhibit; and the October 14 consistency memorandum. The applicant describes equipment, tools and maintenance inventory storage, one additional employee, no new vehicle testing or deliveries, limited storage of motor and hydraulic oils, and accessory sanitary facilities. These facts form the basis for the project-specific CEQA assessment, with applicable original EIR mitigation measures and the conditions incorporated herein.

3. Changed project / circumstances / information assessment

Section 15162 inquiry	**Staff assessment and substantial-evidence basis**
Substantial change in project	Within developed operations compound; new storage/support building and related site work, rather than change to proving-ground test tracks; proposed use and physical impacts are delineated in October record.
Substantially changed circumstances	Joshua trees now have statutory protections not in place at time of original EIR. Updated field survey and avoidance limits address currently documented trees near construction. Conditional avoidance and no-take obligations remain enforceable.
New information of substantial importance	October 2026 biological observations and impact maps identify protected trees and sensitive-resource controls. No new significant impact or substantially more severe impact is demonstrated for the limited approved footprint when conditions are implemented.
Previously rejected mitigation / alternative	No evidence in the reviewed record identifies a newly feasible previously rejected mitigation or alternative that satisfies the statutory test and is being declined; continuing applicable mitigation remains in effect.

Other issue areas	Limited storage use, approximately one added worker, 20 gallons combined noted lubricants, no testing/deliveries, ordinary support utilities, directed lighting; department plans and pre-existing mitigation address construction and utility details.

4. Biological-resource conclusion and protections

The October 13 signed field evaluation identifies eight nearby Joshua trees in two groups approximately 45-50 feet south of construction, no reported trees in the building pad, previously cleared site, 40-foot no-ground-disturbance zone, marked limits and worker education. The October 9 utility overlay expressly routes the proposed 2-inch water line between Joshua tree locations to avoid the mapped 40-foot radius. The worker-education document separately requires hazardous-substance protection within 50 feet. The City incorporates BOTH requirements according to their stated purposes, forbids unauthorized take, and preserves the EIR/MMRP species measures. This is not a claim that prior clearing alone proves avoidance across every improvement.

5. Lead agency determination

The City proposes to find, on substantial evidence and under Guidelines §15162(a)(1)-(3), that: (1) the accessory-storage building within the existing developed proving-ground compound is not a substantial project change necessitating major EIR revision for new or substantially intensified impacts; (2) biological regulatory changes, including western Joshua tree protection, are addressed by mapped avoidance, signed survey conclusions and enforceable controls without identified new significant effect; and (3) no new information of substantial importance shows new significant effects, substantially increased severity, or a feasible previously rejected mitigation/alternative requiring major revision. Applicable 2002 EIR/2003 Addendum mitigation continues. This City-authored analysis supplies the reasoned explanation contemplated by §15164(e) if an addendum is deemed necessary. The Director must consider it with the EIR before action; this draft is not an executed CEQA determination.

6. Environmental review conclusion

Based on the prior EIR and Addendum, the project-specific record and enforceable conditions of approval, staff recommends that the Director determine no further environmental document is required under CEQA Guidelines section 15162 for the defined equipment-storage project.