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INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

55555 AMARGOSA LLC, WAREHOUSE DEVELOPMENT APNS 3138-581-05 & -06 VICTORVILLE, CALIFORNIA

LEAD AGENCY:

CITY OF VICTORVILLE
DEVELOPMENT DEPARTMENT, PLANNING DIVISION
14343 CIVIC DRIVE
VICTORVILLE, CALIFORNIA 92393

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 S. HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745

SEPTEMBER 18, 2024

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: 55555 Amargosa LLC., Warehouse Development

PROJECT APPLICANT: The Applicant for the proposed project is Mr. Simon Bouzaglou, 55555 Amargosa LLC 10300 Arrow Route, Unit 519 Rancho Cucamonga, California 91730.

PROJECT LOCATION: The proposed project site is 18.05 net acre property after the required roadway dedications in the City of Victorville. The project site is located on the southwest of the intersection of Cactus Road and Mesa Linda Avenue. The corresponding Assessor Parcel Numbers (APN) are 3128-581-05 and -06. Currently, no legal address has been assigned to the project site.

CITY AND COUNTY: City of Victorville, San Bernardino County.

PROJECT: This Initial Study and Mitigated Negative Declaration analyzes a proposal to construct and operate a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The plant community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV) parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces. Vehicular access to the project would be provided by a total of four new driveway connections. Two, 40-foot-wide driveway connections would be provided along the south side of Cactus Road. One, 50-foot-wide driveway connection would be provided with the east side of Cantina Road. Finally, one, 50-foot-wide driveway connection would be provided with the west side of Mesa Linda Avenue.

EVALUATION FORMAT: The attached initial study is prepared in accordance 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 the attached Initial Study was guided by Section 15063 of the State CEQA Guidelines. The project was evaluated based on its effect on 21 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 includes 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

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

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

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

Less than Significant Impact with Mitigation: Possible significant adverse impacts have been identified or anticipated and mitigation measures are required as a condition of the project's approval to reduce these impacts to a level below significance.

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in the attached Initial Study.

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

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation, the following finding is made:

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

Signature (prepared by _____) Date

Signature Date

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APPENDICES (UNDER A SEPARATE COVER)

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SECTION 1. INTRODUCTION

1.1 OVERVIEW OF THE PROPOSED PROJECT

This Initial Study and Mitigated Negative Declaration analyzes a proposal to construct and operate a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum). The proposed new building would have a total floor area of 392,857 square foot that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. The proposed office portion would be located along the north-facing elevation. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV) parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces. Vehicular access to the project would be provided by a total of four new driveway connections. Two, 40-foot-wide driveway connections would be provided along the south side of Cactus Road. One, 50-foot-wide driveway connection would be provided with the east side of Cantina Road. Finally, one, 50-foot-wide driveway connection would be provided with the west side of Mesa Linda Avenue.[1]

1.2 PURPOSE OF THIS INITIAL STUDY

The City of Victorville is the designated *Lead Agency,* and as such, the City will be responsible for the project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.[2] As part of the proposed project's environmental review, the City of Victorville has authorized the preparation of this Initial Study.[3] The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Victorville with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a project;
- To facilitate the project's environmental assessment early in the design and development of the proposed project;

[1] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[2] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions.* as Amended 2001. §21067.

[3] Ibid. (CEQA Guidelines) §15050.

- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated the proposed project.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Victorville, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review.

Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.[4] This Initial Study and the *Notice of Intent to Adopt (NOIA) a Mitigated Negative Declaration* will be forwarded to the State Clearinghouse, responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will also be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.[5] Questions and/or comments should be submitted to the following contact person:

City of Victorville Development Department, Planning Division
14343 Civic Drive
Victorville, California 92323

1.3 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.

[4] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069.* 2000.

[5] California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b).* 2000.

SECTION 2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed project site is located in the west-central portion of the City of Victorville. The City of Victorville is located in the southwestern portion of San Bernardino County in the southwestern Mojave Desert physiographic subregion. This physiographic subregion is more commonly referred to as either the "Victor Valley" or the "High Desert" due to its approximate elevation of 2,900 feet above sea level. The Victor Valley is separated from the more populated areas of coastal Southern California by the San Bernardino and San Gabriel mountains. The City of Victorville is bounded on the north by unincorporated San Bernardino County (Oro Grande); on the east by the Town of Apple Valley and unincorporated San Bernardino County (Bell Mountain); the south by the City of Hesperia and unincorporated San Bernardino County (Oak Hills); and on the west by Adelanto and unincorporated San Bernardino County (Baldy Mesa).[6]

Regional access to the City of Victorville is provided by three area highways: the Mojave Freeway (Interstate 15) that extends in a southwest-to-northeast orientation through the center of the City; U.S. Highway 395, traverses the western portion of the City in a northwest-to-southeast orientation; and Palmdale Road (State Route 18) that traverses the southern portion of the City in an east to west orientation.[7] The location of Victorville, in a regional context, is shown in Exhibit 1. A citywide map is provided in Exhibit 2.

The proposed project site is located approximately 1,400 feet to the east of Highway 395. Highway 395 serves as the City's corporate boundary. No address has been assigned to the project site at this time. The corresponding Assessor Parcel Numbers (APNs) are 3128-581-05 and 06. The proposed project site is located south of the unimproved Cactus Road right-of-way and west of the unimproved Mesa Linda Avenue right-of-way. The site is located in Section 10, Township 5 North, Range 5 West (USGS Adelanto, CA 7.5-minute quadrangle). The site's latitude and longitude is 34.534248, -117.392517. A local vicinity map is provided in Exhibit 3. An aerial photograph of the site and the surrounding area is provided in Exhibit 4.

2.2 ENVIRONMENTAL SETTING

The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua trees (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum). The proposed project site is zoned M-2T (Heavy Manufacturing Transitional). Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* The proposed project site is bounded on the north by the unimproved Cactus Road right-of-way. Vacant land abuts the aforementioned roadway further north. This land is zoned as *M-1T (Light Manufacturing)*.[8]

[6] Blodgett Baylosis Environmental Planning. 2022.

[7] Google Earth. Website accessed November 20, 2022.

[8] Google Maps and City of Victorville Zoning Map. Website accessed on November 20, 2022.

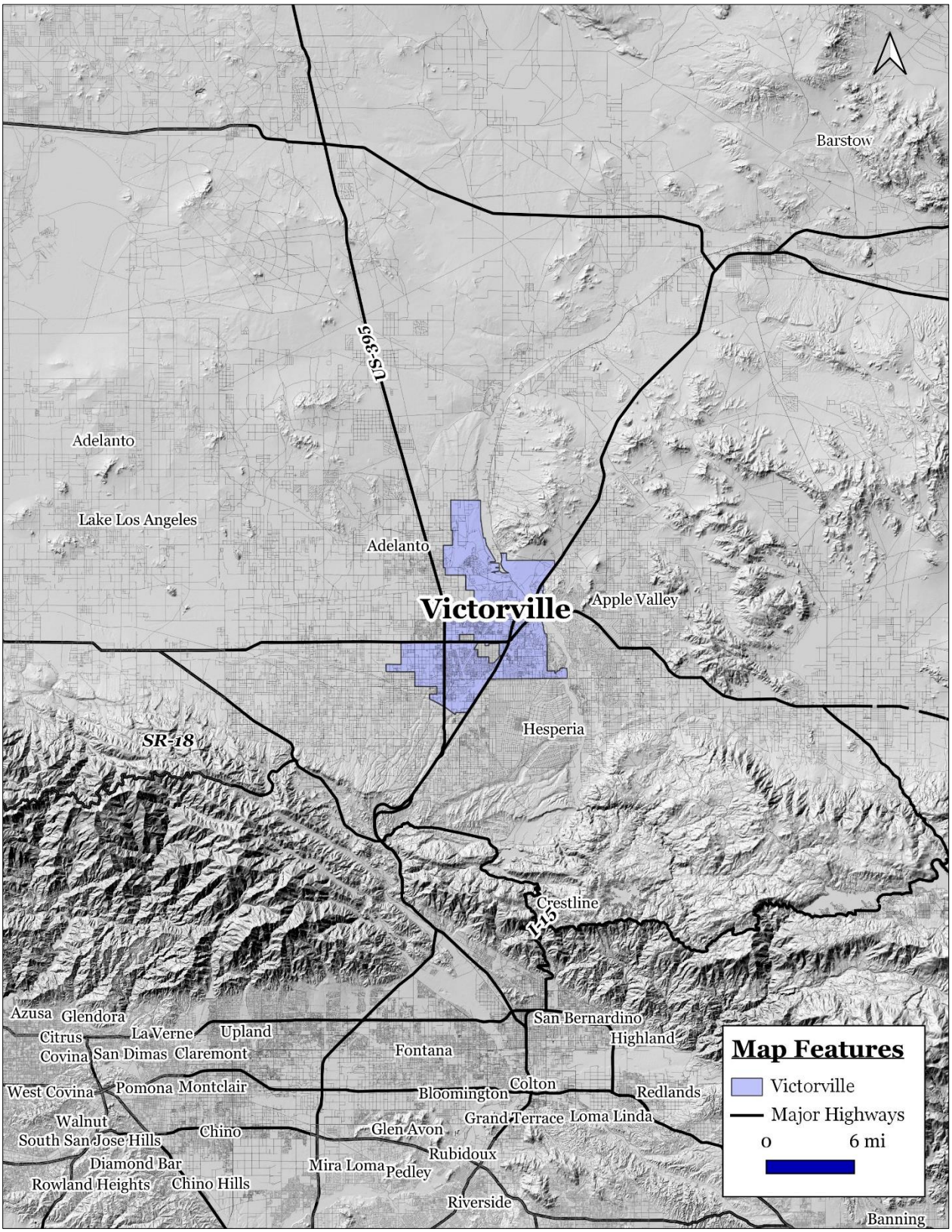

EXHIBIT 1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

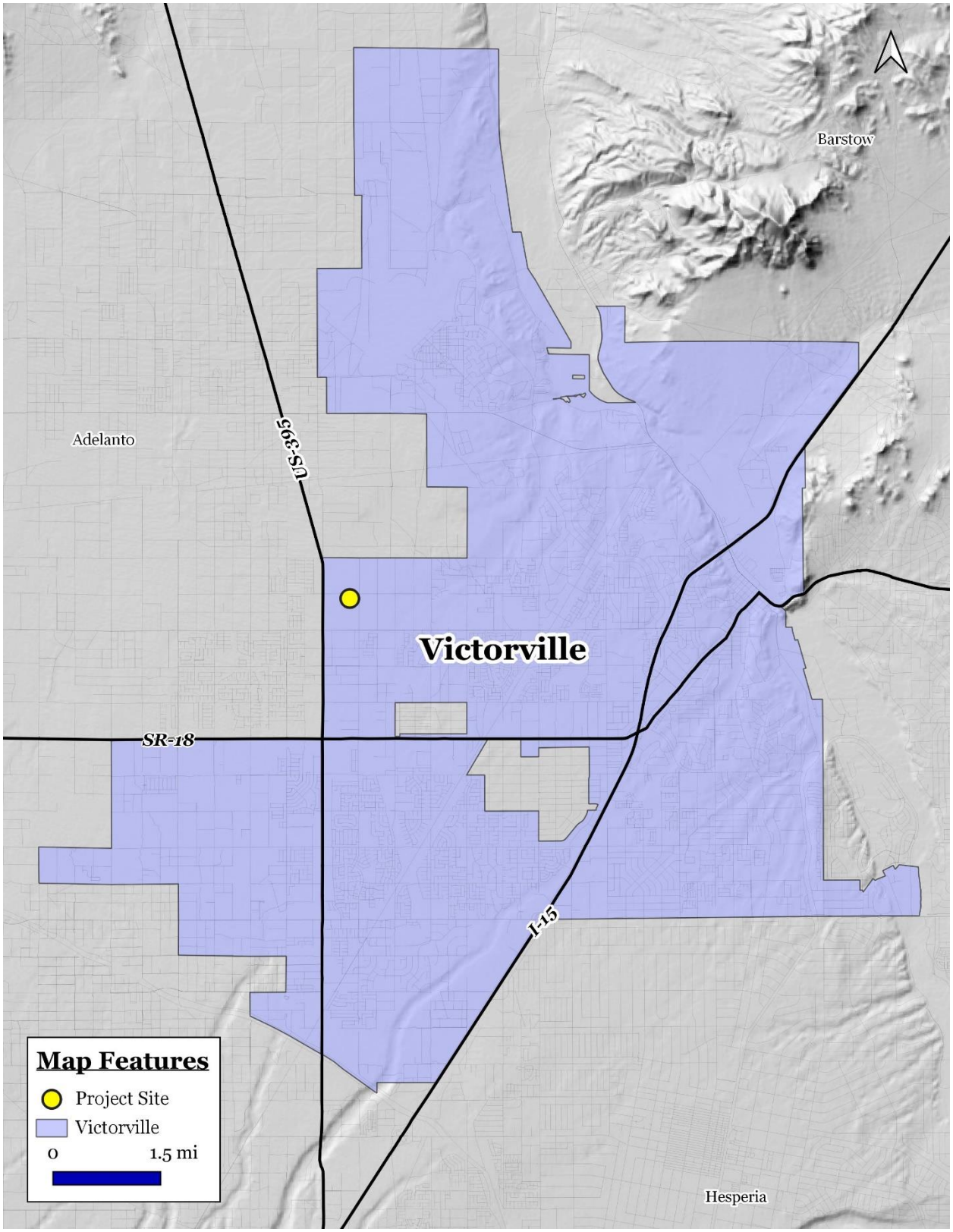

EXHIBIT 2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

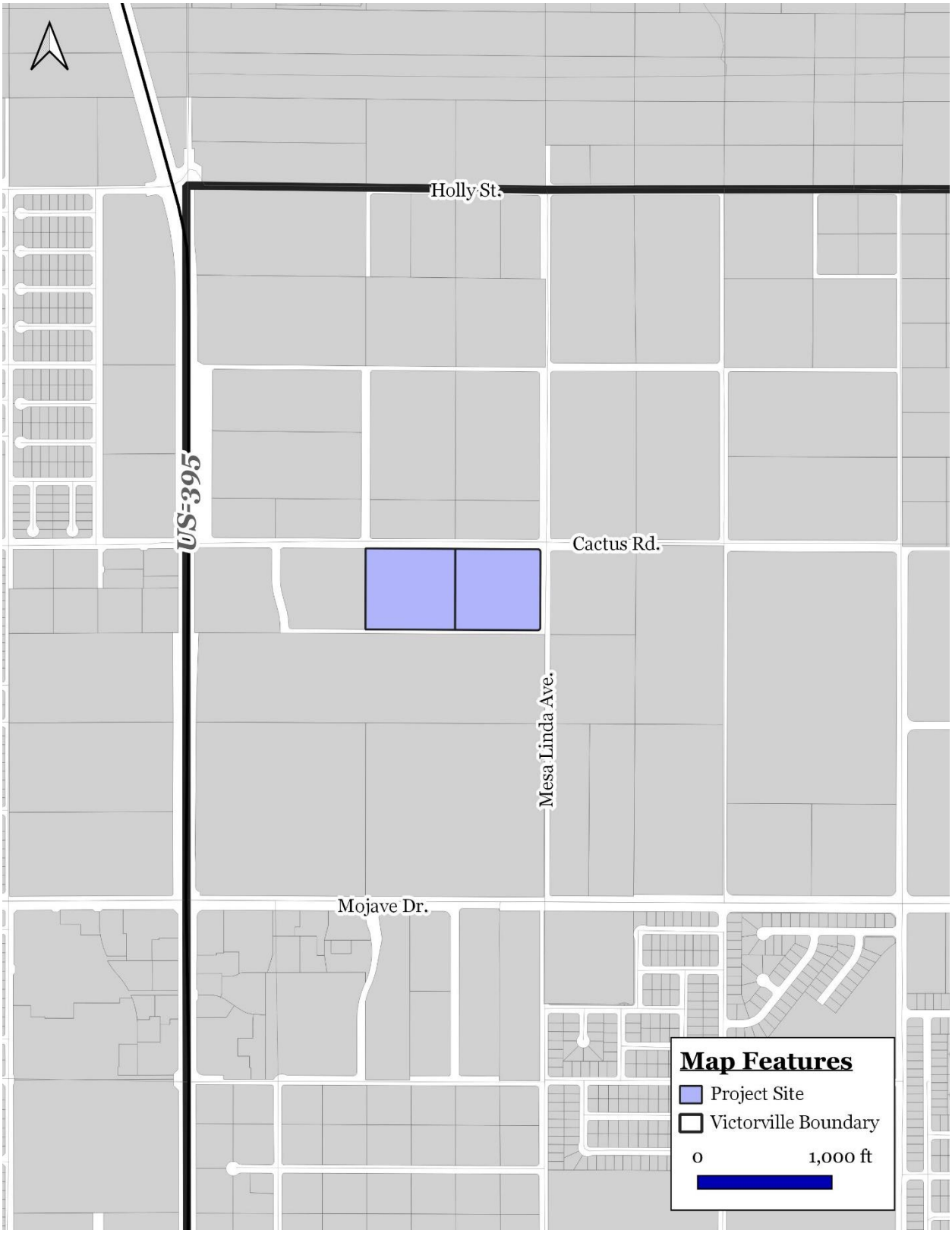

EXHIBIT 3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

EXHIBIT 4 AERIAL IMAGE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *East of the project site:* The proposed project site is bounded on the east by the unimproved Mesa Linda Avenue right-of-way. Vacant, undisturbed land is situated further east, east of the aforementioned roadway right-of-way. This land is zoned as *M-1T (Light Manufacturing)*.[9]

- *South of the project site:* Vacant undeveloped land is located to the south of the project site. This area is zoned as *M-2T (Heavy Manufacturing Transitional)*.[10]

- *West of the project site:* Vacant undeveloped land is located to the south of the project site. This area is zoned as *M-2T (Heavy Manufacturing Transitional)*.[11]

2.3 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed project would involve the construction and operation of a 392,857 square foot warehouse building within an 18.05-acre (786.679 square foot) vacant property. The proposed project would consist of the following elements: [12]

- *Project Site*. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum).[13]

- *New Building*. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. The proposed building would have a maximum height of 42 feet to the top of the parapet. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The proposed building would consist of painted concrete tilt-up construction[14]

- *Office*. proposed office would be located along the north-facing elevation. The proposed office area would consist of 14,933 square feet of floor area.[15]

- *Access and Circulation*. Vehicular access to the project would be provided by a total of four new driveway connections. Two, 40-foot-wide driveway connections would be provided along the south side of Cactus Road. One, 50-foot-wide driveway connection would be provided with the east side of Cantina Road. Finally, one, 50-foot-wide driveway connection would be provided with the west side of Mesa Linda Avenue.[16]

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[9] Google Maps and City of Victorville Zoning Map. Website accessed on November 20, 2022.

[10] Ibid.

[11] Ibid.

[12] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0*. July 2022.

[13] Ibid.

[14] Ibid.

[15] Ibid.

[16] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0*.

- *Parking*. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV) parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces.

- *Landscaping*. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[17]

- *Utilities*. The project site would connect to the existing 12 inch water pipelines located on Cactus Road and Mojave Drive. The project site would connect to the existing 8 inch sewer pipeline located in Cactus Road and Diamond Road.[18]

The proposed project's site plan is shown in Exhibit 5.

2.4 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed building is anticipated to employ about 347 employees over three shifts. This is based on an employment ratio of one employee for every 1,195 square feet of floor area.[19] The hours of operation for the proposed warehouse building is undetermined at this time.

2.5 CONSTRUCTION CHARACTERISTICS

The new industrial development would be developed in one phase. The proposed project would total 392,857 square feet of floor area. The construction for the proposed project is assumed to commence in June 2023 and would take approximately twelve months to complete.[20] During each individual phase of development, the following construction activities will occur:

- *Grading Phase*. The project site would be graded and readied for the construction. This phase would require two months to complete. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment.

- *Site Preparation Phase*. During this phase, the building footings, utility lines, and other underground infrastructure would be installed. This phase would require one month to complete. The typical heavy equipment used during this construction phase would include bulldozers, offroad trucks, back-hoes, front-end loaders, cranes, and forklifts.

[17] Ibid.

[18] Personal communication with project architect.

[19] Natelson Company, Inc. *Employment Density Study, Summary Report*. October 31, 2001.

[20] Steeno Design Studio Inc. Victorville Warehouse. Site Plan. Sheet A-0.

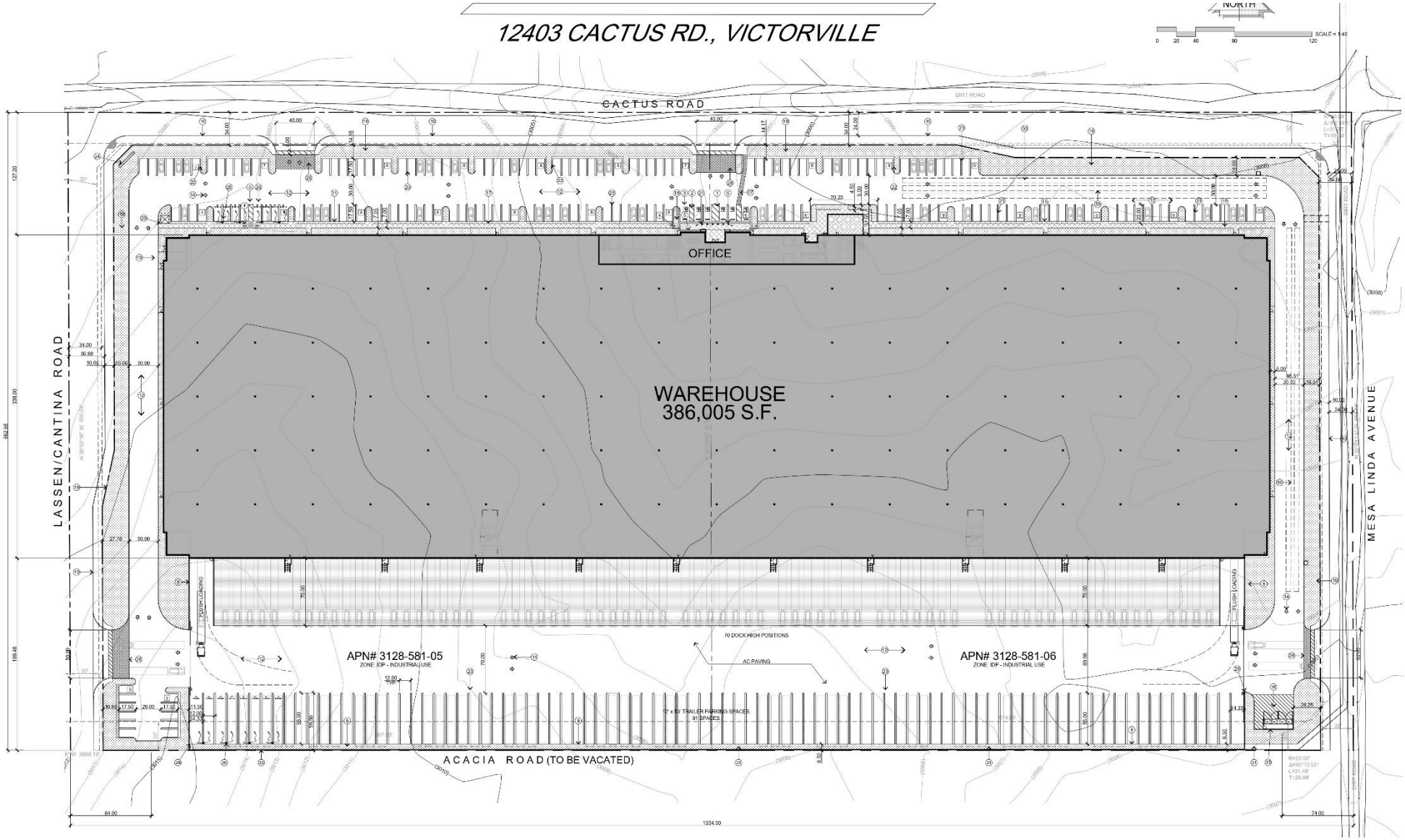

EXHIBIT 5 SITE PLAN

SOURCE: STEENO DESIGN STUDIOS

- *Building Construction Phase*. The new building would be constructed during this phase. This phase will take approximately five months to complete. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This task will take approximately seven months to complete.

- *Paving, Landscaping, and Finishing Phase*. The development site would be paved during this phase. This phase will take approximately two months to complete. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment.

2.6 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Victorville) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- The approval of a new Parcel Map to combine the two existing APNs (3128-581-05 and 06 into a single parcel so as to accommodate the proposed project;
- The approval of a Conditional Use Permit (CUP);
- The approval of the vacation of the existing Acacia Road right-of-way; and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

SECTION 3. ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics (Section 3.1);
Agricultural &Forestry Resources (Section 3.2);
Air Quality (Section 3.3);
Biological Resources (Section 3.4);
Cultural Resources (Section 3.5);
Energy (Section 3.6)
Geology & Soils (Section 3.7);
Greenhouse Gas Emissions; (Section 3.8);
Hazards & Hazardous Materials (Section 3.9);
Hydrology & Water Quality (Section 3.10);
Land Use & Planning (Section 3.11);
Mineral Resources (Section 3.12);
Noise (Section 3.13);
Population & Housing (Section 3.14).
Public Services (Section 3.15);
Recreation (Section 3.16);
Transportation (Section 3.17);
Tribal Cultural Resources (Section 3.18);
Utilities (Section 3.19);
Wildfire (Section 3.20); and,
Mandatory Findings of Significance (Section 3.21).

The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Victorville in its environmental review process (refer to Section 1.3 herein). Under each issue area, an analysis of impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated, and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact*. The proposed project *will not* have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Victorville or other responsible agencies consider to be significant.

- *Less Than Significant Impact with Mitigation*. The proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.

- *Potentially Significant Impact*. The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Victorville in deciding as to whether there is a potential for significant adverse impacts on the environment associated with the implementation of the proposed project.

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect on a scenic vista?				✕
B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.				✕
C. Would the project in nonurbanized areas, substantially degraded the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✕
D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✕

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on aesthetics if it results in any of the following:

- The proposed project would have an adverse effect on a scenic vista, except as provided in PRC Sec. 21099.

- The proposed project would have an adverse effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

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

- The proposed project would, except as provided in Public Resources Code Section 21099, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The evaluation of aesthetics and aesthetic impacts is generally subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination). Changes to the existing aesthetic environment associated with the proposed project's implementation are identified and qualitatively evaluated based on the proposed modifications to the existing setting and the viewers' sensitivity. The

project-related impacts are then compared to the context of the existing setting, using the threshold criteria discussed above.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect on a scenic vista? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due to human activity. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. A total of 70 dock-high doors would be provided along the buildings south-facing elevation.[21]

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south, southwest, and southeast of the site. In addition, local views are already dominated by neighboring development and telecommunication poles and lines. The proposed project will be required to conform to all pertinent development and design standards of the City of Victorville Municipal Code. These Code requirements include the following:

- A Screening is required where truck docks are visible from the right-of-way. Fencing along the site's frontage is limited to four feet in height when located within the required ten-foot setback as measured from property line, so the screening shall be setback 10' and shown on the site plan. Any new fencing along the site's frontage shall be designed to include wrought iron with pilasters every 100 feet and generous landscaping shall be installed within the setback area to provide adequate screening. Alternatively, a decorative tilt-up wall may be proposed. (Refer to Development Code, Section 16-3.11.020 – Table 11-1 & Section 16-3.11.030).
- The applicant shall install trash enclosures in conformance with Section 16-3.24.110 of the Victorville Municipal Code. The enclosure shall have solid block walls with non-transparent metal gates, a solid roof/cover that is architecturally compatible with the primary building(s) onsite and serves to protect the refuse area from inclement weather, as well as wrought iron that fully encloses the trash enclosure between the block wall/metal gates and the roof to prevent unauthorized entry. Additionally, all trash enclosures shall include "walk-in" rear or side access for pedestrian use. The location, design and quantity of said enclosures shall be subject to Planning Staff review and approval. (Refer to Industrial Design Guidelines, Section 16- 3.11.060(d)(2)).
- Utility equipment shall be screened from public view via location within an architecturally integrated structure, utility room, or landscaping and placement sufficient to screen such equipment. (Refer to Industrial Design Guidelines, Section 16-3.11.060(d)(1)).

[21] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

- Wall signage and freestanding signage shall comply with Title 16 standards. (Refer to Development Code, Section 16-3.22.140).
- Undergrounding of utilities and street improvements are required in conjunction with any new development. (Refer to Development Code, Section 16-5.12.170 & Municipal Code, Section 9.32.040).
- The applicant shall install trash enclosures in conformance with Section 16-3.24.110 of the Victorville Municipal Code. The enclosure shall have solid block walls with non-transparent metal gates, a solid roof/cover that is architecturally compatible with the primary building(s) onsite and serves to protect the refuse area from inclement weather, as well as wrought iron that fully encloses the trash enclosure between the block wall/metal gates and the roof to prevent unauthorized entry. Additionally, all trash enclosures shall include "walk-in" rear or side access for pedestrian use. The location, design and quantity of said enclosures shall be subject to Planning Staff review and approval. (Refer to Industrial Design Guidelines, Section 16- 3.11.060(d)(2)).
- To alleviate the unsightly appearance of loading facilities for industrial uses, these areas should not be located at the front of buildings or adjacent to the public street unless adequate means of screening them from view can be accomplished (Refer to Industrial Design Guidelines, Section 16-3.11.060(b)(5)).
- The Industrial Design Guidelines require that new construction account for continuity, massing, and scale; while also incorporating roof forms/parapets, and materials/texture that complement the design. All elevations visible from the street shall provide modulation and variation of building masses, wall planes, and roof parapets, which shall be utilized to screen all rooftop equipment from public view. As proposed, the floor plans do not indicate sufficient wall plane variations or features in accordance with the Industrial Design Guidelines. (Refer to Industrial Design Guidelines, Section 16-3.11.060(c)).
- Consider incorporating tower elements, boxed roof parapets, entry features and changes in vertical wall planes to prevent a boxlike appearance of the structures. (Refer to Industrial Design Guidelines, Section 16- 3.11.060(c)(3-4) & (7)).
- Building materials shall be coordinated with the architectural design and elements of the building and be in accord with the proposed architectural theme. (Refer to Industrial Design Guidelines, Section 16-3.11.060(c)(8)).

Views from the mountains would not be obstructed once the new building has been constructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. *As a result, no impacts would occur.*

B. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway ● No Impact.*

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.[22] The nearest significant roadway in the City is the former "Route 66" located approximately 1.29 miles to the west of the site. One of the original federal routes, Route 66 or the "Will Rogers Highway" was established in 1926. As a major migratory path west, especially during the

[22] California Department of Transportation. *Official Designated Scenic Highways.*

Dust Bowl of the 1930s, it supported the economies of the communities through which it passed. This route was officially decommissioned after the interstate freeways began to define this country's surface transportation and segments of this route that were not replaced by interstate freeway alignments were designated as national scenic byways and renamed "Historic Route 66." Today, from the southern limit of the City of Victorville, the Historic Route 66 follows the current alignment of I-15 to the freeway's interchange with Palmdale Road (SR-18)/7th Street. North of this interchange, Historic Route 66 follows the alignment of 7th Street to D Street continuing northeast on D Street it follows the National Trails Highway alignment into the community of Oro Grande on the north-western edge of the City.[23] The nearest other highways that are eligible for designation as a scenic highways include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The project site is located within a parcel with a rock outcropping on the southern portion of the parcel and development will not occur on this southern portion. Additionally, the proposed site does not contain any sensitive habitats. Lastly, the project site does not contain any buildings listed in the State or National register. *As a result, no impacts would occur.*

C. *Would the project in nonurbanized areas, substantially degraded the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zinging and other regulations governing scenic quality? ● No Impact*

There are no protected views in the vicinity of the project site and the City does not contain any designated or protected scenic vistas.[24] Mitigation has been included under Subsection A as a means to reduce the proposed project's visual impacts. In addition, the project will conform to the City's development and design standards. *As a result, no impacts would occur.*

D. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ● No Impact.*

The proposed project would not expose any existing or proposed sensitive receptors located near the property to nighttime light trespass. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The following City Code requirements would address potential light and glare impacts:

- Site lighting detail shall be submitted with future submittals and match the architectural them of the building - typical "shoebox" style lighting is prohibited. (Industrial Design Guidelines, Section 16-3.11.060(e)). 14. Wall signage and freestanding signage shall comply with Title 16 standards. (Refer to Development Code, Section 16-3.22.140).

As a result, no impacts would occur.

[23] Victorville, City of. *Victorville General Plan 2030, Circulation Element*. October 21, 2008

[24] Victorville, City of. *Victorville General Plan 2030 , Land Use Element*. October 21, 2008

MITIGATION MEASURES

The analysis determined that no significant impacts would occur. As a result, no mitigation would be required.

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project 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 uses?				✖
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✖
C. Would the project **c**onflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✖
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✖
E. Would the project 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 a non-forest use?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on agriculture and forestry resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- The proposed project would 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)).
- The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.

- The proposed project would 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.

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories of land use designation based on soil quality and existing agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows a city or county governments to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with San Bernardino County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project 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 uses? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[25] According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property as shown in Exhibit 3-1. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. *As a result, no impacts would occur.*

B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? ● No Impact.*

According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[26] *As a result, no impacts would occur.*

[25] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[26] California Department of Conservation. *State of California Williamson Act Contract Land.* ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.

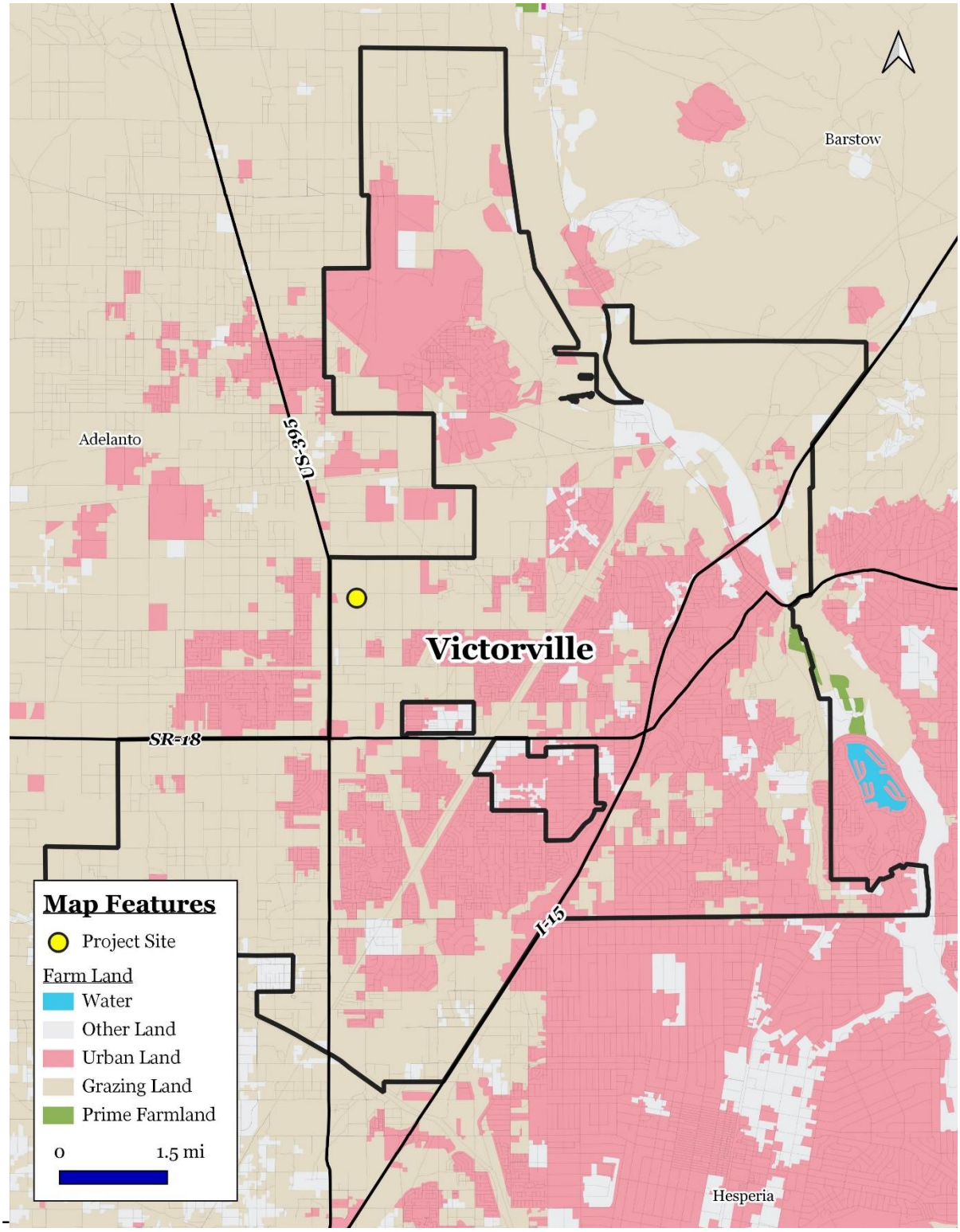

EXHIBIT 3-1 AGRICULTURAL MAP

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ● No Impact.*

The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. There are no forest lands or timberlands located within or adjacent to the site. Furthermore, the site's existing zoning designation does not contemplate forest land or timberland uses. *As a result, no impacts would occur.*

D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? ● No Impact.*

No forest lands are located within the project site. No loss or conversion of forest lands to urban uses will result from the proposed project's implementation. *As a result, no impacts would occur.*

E. *Would the project 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 a non-forest use? ● No Impact.*

The project would not involve loss of farmland to a nonagricultural use or conversion of forest land to non-forest use because the project site is currently vacant and does not contain any significant vegetation. No farmland conversion impacts will occur with the implementation of the proposed project. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✖
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?		✖		
C. Would the project expose sensitive receptors to substantial pollutant concentrations?			✖	
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on air quality if it results in any of the following:

- The proposed project would conflict with or obstruct implementation of the applicable air quality plan.
- The proposed project would 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.
- The proposed project would expose sensitive receptors to substantial pollutant concentrations.
- The proposed project would result in other emissions (such as those leading to odors adversely affecting a substantial number of people.

The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, and damages materials and vegetation. Ozone is formed a by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).
- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).
- *Sulfur Dioxide* (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).
- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM_{10} and 65 pounds per day of $PM_{2.5}$.
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of "smog." The daily threshold is 137 pounds per day of ROG.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively

level and is approximately 926 meters above sea level and contains no slope. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. The proposed office would be located along the north-facing elevation. A total of 70 dock-high doors would be provided along the buildings south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV) parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces.[27]

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. Victorville is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.[28]

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2045 RTP/SCS, the City of Victorville employment will increase from 41,200 in 2016 to 61,200 in 2045, an increase of 20,000 new employees through the year 2045.[29] The proposed project's employment will be significantly less than this figure (347 new employees over two or three shifts). Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project's construction emissions would be below the thresholds of significance established by the MDAQMD (the project's daily construction emissions are summarized in Table 3-1). In addition, the proposed project's long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). *As a result, no conformity impacts would occur.*

B. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ● Less than Significant Impact with Mitigation.*

[27] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[28] Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

[29] Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

According to the MDAQMD, any project is significant if it triggers or exceeds the daily emissions threshold identified previously and noted at the bottom of Tables 3-1 and 3-2. In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the MDAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The Air Quality worksheets of daily construction and operational emissions are attached as Appendix A. As shown in Table 3-1, daily construction emissions will not exceed the MDAQMD significance thresholds.

TABLE 3-1 ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Maximum Daily Emissions	93.1	31.7	31.6	0.06	6.71	3.94
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2022.1.1.24

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEMod V.2022.1.1.24 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the MDAQMD daily emissions thresholds.

TABLE 3-2 ESTIMATED OPERATIONAL EMISSIONS IN LBS./DAY

Emission Source	ROG	NOx	CO	SO2	PM10	PM2.5
Mobile (lbs./day)	2.93	1.65	13.1	0.01	2.04	0.53
Area (lbs./day)	11.8	0.15	17.2	--	0.03	0.02
Energy (lbs./day)	0.11	2.02	1.70	0.01	0.15	0.15
Total (lbs./day)	14.9	3.60	32.0	0.04	2.22	0.71
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod V.2022.1.1.24

The analysis presented in Tables 3-1 and 3-2 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3-1 and 3-2, the impacts are considered to be less than significant. In addition, the MDAQMD Rule Book contains numerous regulations governing various activities undertaken within the district. Among these regulations is Rule 403.2 – Fugitive Dust Control which was adopted in 1996 for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the district. All internal roadways and parking areas will be paved. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes.[3] The following mitigation measures have been incorporated herein to further reduce the potential air quality impacts to levels that are less than significant.

- The Applicant shall prepare and submit to the MDAQMD, prior to commencing earth-moving activity, a dust control plan that describes all applicable dust control measures that will be implemented at the project;
- The Applicant shall ensure that signage, compliant with Rule 403 Attachment B, is erected at each project site entrance not later than the commencement of construction.
- The Applicant shall ensure the use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.
- All perimeter fencing shall be wind fencing or the equivalent, to a minimum of four feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown fugitive dust. This wind fencing requirement may be superseded by local ordinance, rule or project-specific biological mitigation prohibiting wind fencing.
- All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Take actions to prevent project-related track out onto paved surfaces and clean any project-related track out within 24 hours. All other earthen surfaces within the project area shall be stabilized by natural or irrigated vegetation, compaction, chemical or other means sufficient to prohibit visible fugitive dust from wind erosion.

As a result, the impacts would be less than significant with Mitigation.

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? ● Less than Significant Impact.*

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. Sensitive receptors in the vicinity of the project are shown in Exhibit 3-2. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. The nearest sensitive receptors to the project site includes single family homes located west of Caliente Road approximately 2,130 feet west.

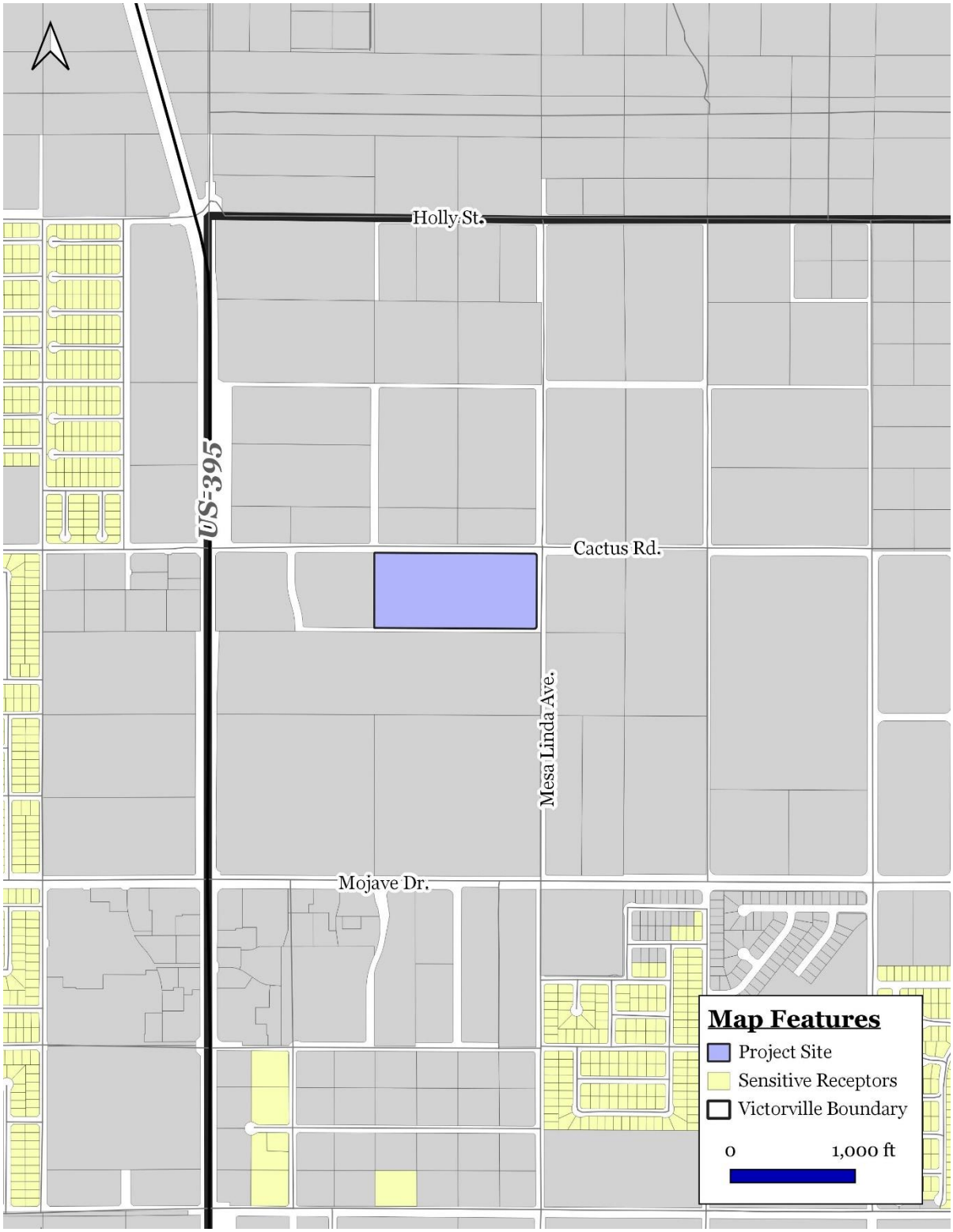

EXHIBIT 3-2 AIR QUALITY SENSITIVE RECEPTORS MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

The Air Toxics [Hot Spots] Act requires that each local Air Pollution Control District or Air Quality Management District to determine which facilities will be required to prepare a health risk assessment (HRA). As defined under the Act, a HRA includes a comprehensive analysis of the dispersion of hazardous substances in the environment, their potential for human exposure, and a quantitative assessment of both individual and population-wide health risks associated with those levels of exposure. Senate Bill 1731, which amends the "Hot Spots" Program, requires the Office of Environmental Health Hazard Assessment (OEHHA) to adopt risk assessment guidelines for the program using a full public review process. The modelling protocols outlined by the OEHHA do not apply to this project (refer Notice of "Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015") given that the project is not subject to a 1401 Permit. The proposed project will not be subject to the requirements of a Rule 1401 Permit (New Source Review of Toxic Air Contaminants) at this time. This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants. For new facilities, the rule requires the facility-wide cancer risk to be less than one in one million at any school or school under construction within 500 feet of the facility. If there are no schools within 500 feet, the same risk levels must be met at any school or school under construction within 500 to 1,000 feet unless there is a residential or sensitive receptor within 150 feet of the facility. As indicated previously, there are no schools within this radius. The nearest school to the project site is Melva Davis Academy of Excellence, located 4,000 feet east of the project.

The U.S. trucking fleet is transitioning to newer clean diesel technology which translates into fuel savings, lower greenhouse gas emissions and a reduction in diesel particulate emissions. This newest generation of clean diesel trucks will have NOx emissions that are 99 percent lower than older generations of larger trucks along with 98 percent fewer diesel particulate emissions, resulting in significant clean air benefits. The new more restrictive emissions requirements, together with the regulations limiting truck idling times to 5 minutes will mitigate potential impacts related to truck diesel emissions. While the use of "clean diesel" trucks were not identified as a mitigation, all heavy-duty trucks sold in California since 2011 must meet NOx emissions of no more than 0.20 grams per brake horsepower hour (g/BHP-hr.). Finally, the proposed project's projected short-term and long-term emissions would be below the MDAQMD's thresholds of significance. *As a result, the impacts would be less than significant.*

D. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? ● Less than Significant Impact.*

All materials will be stored within the proposed building. In addition, construction truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes, which helps to reduce exhaust-related odors. Furthermore, the project's contractors must adhere to all pertinent MDAQMD and CARB rules and regulations that govern odors. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The following mitigation measures have been incorporated herein to further reduce the potential air quality impacts to levels that are less than significant.

AIR Mitigation #1. The Applicant shall prepare and submit to the MDAQMD, prior to commencing earth-moving activity, a dust control plan that describes all applicable dust control measures that will be implemented at the project;

AIR Mitigation #2. The Applicant shall ensure that signage, compliant with Rule 403 Attachment B, is erected at each project site entrance not later than the commencement of construction.

AIR Mitigation #3. The Applicant shall ensure the use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.

AIR Mitigation #4. All perimeter fencing shall be wind fencing or the equivalent, to a minimum of four feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown fugitive dust. This wind fencing requirement may be superseded by local ordinance, rule or project-specific biological mitigation prohibiting wind fencing.

AIR Mitigation #5. All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Take actions to prevent project-related track out onto paved surfaces and clean any project-related track out within 24 hours. All other earthen surfaces within the project area shall be stabilized by natural or irrigated vegetation, compaction, chemical or other means sufficient to prohibit visible fugitive dust from wind erosion.

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✖		
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
C. Would the project have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✖
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✖
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✖		
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- The proposed project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- The proposed project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.
- The proposed project would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- The proposed project would 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.
- The proposed project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are considered vulnerable and can become candidates for future listing as threatened or endangered.

A Biological Study was conducted by RCA Associates, attached as Appendix B, on November 23, 2022 to determine the special-status species recorded in the area.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● Less than Significant Impact with Mitigation.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum). The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[30]

The relatively flat site is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum).[31]

The site supports a minimal amount of wildlife, with many of them being birds. No mammals were observed on site. Species that were not observed but are expected to occur on site given their abundance in the surrounding areas include California ground squirrel (Otospermophilus beecheyi), antelope ground squirrel (Ammospermophilus leucurus), jack rabbit (Lepus californicus) and cottontail rabbit (Sylvilagus). Although not seen, coyote signs were also observed on site including scat throughout the property. Birds observed included white crowned sparrow (Zonotrichia leucophrys), common ravens (Corvus corax), house finch (Carpodacus mexicanus), northern mockingbird (Mimus polyglottos), house sparrow (Passer domesticus), and rock pigeon (Columba livia). Section 5.0 provides a more detailed discussion of the various species observed during the surveys. No reptiles were observed during the field investigation. Some species that are expected to occur on site include the western whiptail lizard (Cnemidophorus tigris) and common side-blotched lizard (Uta stansburiana).[32]

No potential riverine channels were observed during the November field surveys. It is the opinion of RCA Associates, Inc. that no additional surveys will be required. In addition, no sensitive habitats (e.g., sensitive species, critical habitats, etc.) have been documented in the immediate area according to the CNDDB (2022) and none were observed during the field investigations. The site supports a disturbed desert scrub community which is common in the area (Figure 3). Species present on the site included kelch grass (Schismus barbatus), creosote bush (Larrea tridentata), Asian mustard (Brassica tournefortii), Nevada jointfir (Ephedra nevadensis), white bursage (Ambrosia dumosa), and western Joshua tree (Yucca brevifolia). Birds observed included ravens (Corvus corax), rock pigeon (Columba livia), and house finch (Haemorhous mexicanus). No mammals were present during the November 2022 survey, but some that may occur on site include the Antelope Ground squirrel (Ammospermophilus leucurus), jackrabbit (Lepus californicus) and desert cottontails (Sylvilagus audubonii). Coyote (Canis latrans) scat and tracks were observed during the field investigations and the species is expected to traverse the site during hunting activities. Other wildlife species that may occur on site include California ground squirrels (Otospermophilus beecheyi) and Merriam's kangaroo rats (Dipodomys merriami) may also occur on the

[30] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[31] RCA Associates, Inc. *General Biological Resources Assessments*. Report dated November 23, 2022.

[32] RCA Associates, Inc. *General Biological Resources Assessments*. Report dated November 23, 2022.

site given their wide-spread distribution in the region. No distinct wildlife corridors were identified on the site or in the immediate area. No reptiles were observed on site during the November 2022 field investigations. However, some reptiles that may inhabit the site include the Western Whiptail Lizard (Cnemidophorus tigris) and common Side-blotched lizard (Uta stansburiana). No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations. The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.[33]

- *Desert Tortoise:* The site is located within the documented tortoise, a state and federal threatened species, habitat according to CNDDB (2022). The property does not support habitat for the desert tortoise based on the location of the site in a semi-developed area of Victorville. No tortoises were observed anywhere within the property boundaries during the November 21, 2022, surveys. The species is not expected to move onto the site in the near future based on the absence of any potential burrows or sign, absence of any recent observations in the immediate area, and the presence of busy roadways in the immediate area which may act as barriers to migration of tortoises. The protocol survey results are valid for one year as per CDFW and USFWS requirements.
- *Mohave Ground Squirrel:* The Mohave ground squirrel is a California state threatened species that have a short, flat, furred, white, underside tail, uniformly brown (with no spots or stripes). They inhabit open desert scrub, alkali desert scrub, and annual grasslands on sandy to gravelly surfaces in the Mojave Desert. No suitable habitat, occupiable burrows, or Mohave ground squirrels were found on the site. It is the opinion of RCA Associates, Inc. that the habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the following criteria, that there have been two recent sightings, within 20 years, of the species in the Adelanto quadrangle.
- *Swainson's Hawk:* The site is located within documented Swainson's hawk habitat, a state threatened raptor, according to CNDDB (2022). No hawks were seen on the property during the survey, and no suitable habitat was observed. Swainson's hawks occupy grasslands and breed in trees that are the only ones seen for miles. Swainson's hawks are not likely to occur on the site due to lack of habitat and prime vegetation but may be observed flying over the site during hunting activities.
- *Burrowing Owl:* The site is located within documented burrowing owl habitat according to CNDDB (2022). No owls or owl sign was observed were seen on the property during the survey. Owl sign includes feathers, castings, or whitewash. There were no potential suitable burrows on site or in the zone of influence (ZOI) of the site. It is the opinion of RCA Associates, Inc. that no owls inhabit the site and they are not likely to inhabit the site in the future given the current partially developed and cleared landscape.
- *Le Conte's thrasher:* Le Conte's thrashers have not been recently observed in the area according to CNDDB (2022). Thrashers are not expected to occur on the site due to lack of critical vegetation used by the species, such as saltbush and catclaw acacia. Thrashers may be very infrequent in the area given the low population levels in the region as well as the lack of any recent sightings according to the CNDDB.

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site. No potential drainage channels

[33] RCA Associates, Inc. *General Biological Resources Assessments*. Report dated November 23, 2022.

were observed within the site boundary

- *Sensitive Wildlife:* Within the Hesperia Quad, seven species are listed as Species of Special Concern. These are the yellow warbler, burrowing owl, pallid bat, long-eared owl, coast horned lizard, Le Conte's thrasher, and gray vireo. The property does not contain suitable habitat for any of the said species. No physical sign or observations occurred during the March field investigations for the Le Conte's thrasher. The site does not contain suitable burrows for burrowing owls but no owl sign (i.e., scat, whitewash, castings, feathers) were observed during the field surveys. The Crotch's bumble bee (Bombus crotchii) is found between San Diego and Redding in a variety of habitats including open grasslands, shrublands, chaparral, desert margins including Joshua tree and creosote scrub, and semi-urban settings. It is near endemic to California, with only a few records from Nevada and Mexico. Crotch's bumblebee nests underground, often in abandoned rodent dens. It is a nonmigratory species of bumblebee. A petition was submitted by the Xerces society, Defenders of Wildlife, and the Center for Food Safety to the California Fish and Game Commission in October 2018 to list Crotch's bumblebee and three others as endangered under the California Endangered Species Act.
- *Sensitive Plants:* There are two plant species that have been documented in the Hesperia quad, the short-joint beavertail cactus and white-pygmy-poppy. In recent years, only the short-joint beavertail has been seen within 20 years in the Hesperia quad, while the white pygmy-poppy has not been observed for over 20 years. The site currently does not support suitable habitat for the two species and none were observed on site during the December 16, 2021 field investigations. These species are not expected to occur on the site in the foreseeable future based on the length of time they have been observed in the area and lack of suitable habitat, and therefore the project is not expected to impact any sensitive species.
- *Sensitive Wildlife:* Within the Hesperia Quad, seven species are listed as Species of Special Concern. These are the yellow warbler, burrowing owl, pallid bat, long-eared owl, coast horned lizard, Le Conte's thrasher, and gray vireo. The property does not contain suitable habitat for the yellow warbler, Le Conte's thrasher, long-eared owls, gray vireo, or pallid bat. The area has suitable habitat for coast horned lizards and burrowing owls, but given the disturbance of the site and its location within the developed city of Victorville, these two species are not expected to inhabit the property. The site also does not contain any suitable burrows for burrowing owls, and no signs of owls (e.i. scat, feathers) were found on the property and are unlikely to inhabit the site in the future given the lack of occupiable burrows.

Future development activities include the grading and removal of all vegetation from the 3.18-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be negligible. This assumption is based on the habitat containing scarce vegetation of non-native species. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any active burrows. Joshua trees (a state candidate species) were observed in the field investigations during the site survey and will require an Incidental Take Permit or Western Joshua Tree Conservation Act permit if removed from the property. The following mitigation measures would be required.

- Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be

conducted prior to the commencement of Project-related ground disturbance. a. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged. b. Pre-construction surveys shall encompass all areas within the potential footprint of disturbance for the project, as well as a reasonable buffer around these areas.

- A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those trees that would be removed during Project construction. a. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible.
- Prior to construction, the project proponent is required to obtain an Incidental Take Permit (ITP) through CDFW for the take of 2 Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met:

  (1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height.

  (2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree.

  (3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees.

  (4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Victorville falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1.Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

The above mitigation measures would reduce the impacts to levels that are less than significant.

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● No Impact.*

According to the United States Fish and Wildlife Service and the results of the site visits, there are no wetland or migratory bird nesting areas located within the project site.[34] The site in its entirety is

[34] United States Fish and Wildlife Service. *National Wetlands Inventory*.

undeveloped though portions have undergone significant disturbance. In addition, there is no riparian habitat located on-site or in the surrounding areas.[18] No offsite wetland or migratory bird nesting areas will be affected by the proposed development since all development will be confined to the project site. *As a result, no impacts are anticipated.*

C. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ● No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.[35] The site in its entirety is undeveloped though portions have been heavily disturbed. *As a result, no impacts would occur.*

D. *Would the project 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? ● No Impact.*

The project site's Zoning designation is M-2T (Heavy Manufacturing Transitional). The site's utility as a habitat and a migration corridor is constrained by the presence of three nearby Interstate Freeway, local roadways, and fencing. Additionally, there was little to no evidence of any native resident or migratory fish or wildlife species present within the project site. *As a result, no impacts would occur.*

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ● Less than Significant Impact with Mitigation.*

The City of Victorville enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the city to assure the Joshua tree is not a "specimen" class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006). The City of Victorville's Municipal Code (13.33) instructs to follow the County of San Bernardino's ordinance (88.01.060), which requires preservation of Joshua trees given their importance in the desert community. As a result, mitigation measures would be required. *With the implementation of the **BIO Mitigation #3** mitigation measure, the impacts would be less than significant.*

F. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ● No Impact.*

The proposed project's implementation would not be in conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State

[35] RCA Associates, Inc. *General Biological Resources Assessments*. Report dated November 23, 2022.

habitat conservation plans. *As a result, no impacts are anticipated.*

MITIGATION MEASURES

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.[36]

BIO Mitigation #1. Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of Project-related ground disturbance. a. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged. b. Pre-construction surveys shall encompass all areas within the potential footprint of disturbance for the project, as well as a reasonable buffer around these areas.

BIO Mitigation #2. A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those trees that would be removed during Project construction. a. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible.

BIO Mitigation #3 Prior to construction, the project proponent is required to obtain an Incidental Take Permit (ITP) through CDFW for the take of 2 Joshua trees. Per Section 1927.4 of the WJTCA, CDFW may authorize, by permit, the taking of a western Joshua tree if all of the following conditions are met:

(1) The permittee submits to CDFW for its approval a census of all western Joshua trees on the project site, including photographs, that categorize the trees according to the following size classes: a. Less than one meter in height. b. One meter or greater but less than five meters in height. c. Five meters or greater in height.

(2) The permittee avoids and minimizes impacts to, and the taking of, the western Joshua tree to the maximum extent practicable. Minimization may include trimming, encroachment on root systems, relocation, or other actions that result in detrimental but nonlethal impacts to western Joshua tree.

(3) The permittee mitigates all impacts to, and taking of, the western Joshua tree. In lieu of completing the mitigation on its own, the permittee may elect to pay mitigation fees.

(4) CDFW may require the permittee to relocate one or more of the western Joshua trees. The City of Victorville falls within an area of the WJTCA which qualifies for reduced Mitigation Fees for impacts to western Joshua trees (Fish and Wildlife Code, Section 1927). The reduced Mitigation Fees are as follows [Fish and Wildlife Code, Section 1927.3 (d)]: 1.Trees 5 meters of greater in height - $1,000; 2. Trees 1 meter or greater but less than 5 meters in height - $200; 3. Trees less than 1 meter in height - $150. Each western Joshua tree stem or trunk arising from the ground shall be

[36] RCA Associates, Inc. *General Biological Resources Assessments*. Report dated November 23, 2022.

considered an individual tree requiring mitigation, regardless of proximity to any other western Joshua tree stem of trunk. Mitigation is required of all trees, regardless of whether they are dead or alive. It is recommended that specific Joshua tree mitigation measures or determination of in-lieu fees be addressed through consultation with CDFW.

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause substantial adverse change in the significance of a historical resource pursuant to §15064.5?				✖
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		✖		
C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- The proposed project would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- The proposed project would disturb any human remains, including those interred outside of formal cemeteries.

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,

- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.[37]

A Cultural Resources Study was also conducted by Duke CRM, attached as Appendix C,

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum). The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[38]

[37] U. S. Department of the Interior, National Park Service. National Register of Historic Places. http://nrhp.focus.nps.gov. 2010.

[38] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance.

On October 18, 2022, DUKE CRM conducted a records search at the South Central Coastal Information Center (SCCIC). The SCCIC is part of the California Historical Resources Information System (CHRIS) and is located at California State University, Fullerton. The records search included a review of all recorded cultural resources and reports within a ½-mile radius of the proposed project site. Review of the SCCIC data indicates that no cultural resources have been previously identified within the Project. Five resources have been recorded within the ½-mile search radius. SCCIC records indicate that one cultural resource report (SB-07056) covers an area directly adjacent to the project site, and an additional eight reports cover areas within ½-mile of the project site. Report SB-07056 was a cultural resource study completed in 2010 for a pole replacement project. The report did not document any cultural resources.[39]

In addition, the California Built Environment Resources Directory (BERD) was examined. The BERD includes the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). The BERD did not identify any cultural resources within the project site. DUKE CRM also consulted the Cultural Resources Technical Report appendix to the 2022 Environmental Impact Report for the City of Victorville General Plan Update. Review of this report did not identify any cultural resources within the Project. Finally, a review of historical aerial photographs and historical topographic maps was conducted using the University of California, Santa Barbara's online FrameFinder program and the USGS Historical Topographic Map Explorer. Historical aerial images from 1952 and 1960 show no development within the project area. In addition, the 1956 Adelanto 1:24,000, 1966 San Bernardino 1:25,000, and 1982 Victorville 1:100,000 historical topographic maps do not show any buildings, indicating that no development took place within the project site prior to 1982. Based on a map depicting ethnographically-known Native American villages according to accounts of Franciscan missionary explorer Francisco Garcés (Earle 2005), the nearest village to the project site was Topipabit, thought to be located along the Mojave River approximately 3 miles northeast of the project site.[40]

The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[41] The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).[22] The project site is vacant and undisturbed though the developments in surrounding areas do not have any historical or cultural significance. A Cultural Resources Study was also conducted by Duke CRM, attached as Appendix D, has not identified and paleontological resources and is considered to have a low sensitivity for paleontological

[39] Duke CRM. *Paleontological and Cultural Resources Assessment for the Victorville Warehouse Project*, City of Victorville, County of San Bernardino, California. November 18, 2022.

[40] Duke CRM. *Paleontological and Cultural Resources Assessment for the Victorville Warehouse Project*, City of Victorville, County of San Bernardino, California. November 18, 2022.
[41] California Department of Parks and Recreation. *California Historical Resources*. Website accessed on November 24, 2022.

resources. The project's implementation will not impact any Federal, State, or locally designated historic resources. *As a result, no impacts would result.*

B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? ● Less than Significant Impact with Mitigation.*

No signs of human habitation nor any cemeteries are apparent within or near the project, and no signs of development on the parcel appear on any historic aerial map reviewed, nor on later USGS maps. On October 18, 2022, DUKE CRM conducted a records search at the South Central Coastal Information Center (SCCIC). The SCCIC is part of the California Historical Resources Information System (CHRIS) and is located at California State University, Fullerton. The records search included a review of all recorded cultural resources and reports within a ½-mile radius of the proposed project site. Review of the SCCIC data indicates that no cultural resources have been previously identified within the project site. Five resources have been recorded within the ½-mile search radius. SCCIC records indicate that one cultural resource report (SB-07056) covers an area directly adjacent to the project site, and an additional eight reports cover areas within ½-mile of the project site. Report SB-07056 was a cultural resource study completed in 2010 for a pole replacement project. The report did not document any cultural resources.[42]

No cultural resources are recorded within the project area, and no cultural resources were identified during the field survey, which suggests a low potential for cultural resources within the project site. The five cultural resources recorded within ½-mile of the project site are small historic refuse scatters and historic isolates, which are ubiquitous within the desert landscape and are not considered significant. Therefore, it is not likely that any cultural or historical resources will be impacted by the Project. DUKE CRM does not recommend any additional work for cultural resources. Project changes may have the potential to disturb sediment that are previously undisturbed and may impact previously unidentified cultural resources

DUKE CRM archaeologists Alexandria Bullate, B.A., and Lauren Biltonen, B.A., conducted an intensive pedestrian survey of the Project boundaries on October 21, 2022. Ms. Bulato and Ms. Biltonen are both crosstrained in the identification of paleontological resources. The majority of the 27-acre Project boundary (see Attachment A, Map 3: Project Aerial) was intensively surveyed using parallel transects spaced no more than 15 meters apart. Ground visibility was very good (between 90 to 100 percent) throughout most of the Project, with some minor visibility limitations due to sparse shrubbery. The northern approximately 40 percent of the project area has been extensively disturbed by recent mechanical vegetation clearing. Approximately 4.5 acres near the northwest corner of the project site are covered with pea gravel, obscuring ground visibility; approximately two acres of this portion of the Project currently contain trailer beds parked end-to-end in narrow rows, which limited survey coverage in this area. This portion of the Project was surveyed where possible using transects spaced between 20 and 40 meters apart.[43]

DUKE CRM assessed the proposed project for potentially significant impacts to paleontological and cultural resources under CEQA. Research and field survey did not identify any paleontological resources within the project site, and research suggests that the project area can be considered to have a low sensitivity for paleontological resources. Based on this assessment, no further paleontological investigation is warranted. No cultural resources are recorded within the project area, and the pedestrian survey did not identify any

[42] Duke CRM. *Paleontological and Cultural Resources Assessment for the Victorville Warehouse Project*, City of Victorville, County of San Bernardino, California. November 18, 2022.

[43] Duke CRM. *Paleontological and Cultural Resources Assessment for the Victorville Warehouse Project*, City of Victorville, County of San Bernardino, California. November 18, 2022.

significant prehistoric or historical cultural resources. The project area was assessed as having a low sensitivity for cultural resources, and archaeological monitoring of ground disturbing activities is recommended.[44] Since it is possible that previously unrecognized resources could exist at the site, the proposed project would be required to implement the following mitigation measures:

- Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Victorville that a qualified archaeologist/paleontologist has been retained by the project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.
- Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.
- A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Victorville prior to building final.
- Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits and paleontological resources. In the event that field personnel encounter buried cultural materials and/or paleontological resources, work in the immediate vicinity of the find should cease and a qualified archaeologist/paleontologists must be retained to assess the significance of the find. The qualified archaeologist/paleontologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist/paleontologist finds that any cultural resources present meet eligibility requirements for listing on the California register or the national register of historic places (national register), plans for the treatments, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:
    - Historic-period artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
    - Historic-period structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
    - Pre-historic flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and/or cryptocrystalline silicates; and,
    - Dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, ground stone and fire affected rocks; and Human remains.

Adherence to the aforementioned mitigation measures would reduce the impacts to levels that would be less than significant.

[44] Ibid.

C. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries? ● Less than Significant Impact.*

There are no dedicated cemeteries located in the vicinity of the project site. The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

> "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures."

Additionally, Section 5097.98 of the Public Resources Code states:

> "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning the investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

Adherence to the aforementioned standard condition will be required in the event human burials are encountered during grading. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The project area was assessed as having a low sensitivity for cultural resources, and archaeological monitoring of ground disturbing activities is recommended.[45] Since it is possible that previously unrecognized resources could exist at the site, the proposed project would be required to the following mitigation measures:

> **CUL Mitigation #1.** Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Victorville that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect

[45] Duke CRM. *Paleontological and Cultural Resources Assessment for the Victorville Warehouse Project*, City of Victorville, County of San Bernardino, California. November 18, 2022.

earthmoving activities in the event that suspected paleontological resources are unearthed.

CUL Mitigation #2. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

CUL Mitigation #3. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Victorville prior to building final.

CUL Mitigation #4. Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits and paleontological resources. In the event that field personnel encounter buried cultural materials and/or paleontological resources, work in the immediate vicinity of the find should cease and a qualified archaeologist/paleontologists must be retrained to assess the significance of the find. The qualified archaeologist/paleontologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist/paleontologist finds that any cultural resources present meet eligibility requirements for listing on the California register or the national register of historic places (national register), plans for the treatments, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

- Historic-period artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- Historic-period structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
- Pre-historic flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and/or cryptocrystalline silicates;
- Dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, ground stone and fire affected rocks; and Human remains.

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✖	
B. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on energy resources if it results in any of the following:

- The proposed project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the proposed project's construction or operation.
- The proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod. In addition, it was assumed the new buildings would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV)

parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces.[46]

Southern California Edison (SCE) provides electricity to the project site. Currently, the existing site is vacant and does not use electricity. Therefore, the proposed project would cause a permanent increase in demand for electricity when compared to existing conditions. The increased demand is expected to be sufficiently served by the existing SCE electrical facilities. According to the worksheets provided in Appendix B, the proposed project is anticipated to consume 1,811,475 kWH on a yearly basis. The proposed project is located within the service area of the Southwest Gas Company. The project site is currently vacant and has no demand on natural gas. Therefore, the development of the proposed project will create a permanent increase in the demand for natural gas. According to the worksheets provided in Appendix B, the proposed project is anticipated to consume 4,401.9 cubic feet of natural gas on a daily basis.

During construction, the proposed project would consume energy related to the use of fuels used to power construction vehicles and other energy-consuming equipment that would be used during site clearing, grading, and construction. Construction equipment is estimated to consume a total of 45,418 gallons of diesel fuel over the entire construction duration. Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on the projected number of trips the proposed project would generate during construction, the average trip distances by trip type, and fuel efficiencies estimated in the CalEEMod analysis emission model. Energy consumed during construction would be temporary in nature and would not present a significant demand on energy resources. The proposed project would be constructed pursuant to the 2022 energy standards of Title 24. Construction equipment greater than 150 horsepower (hp), is also required to comply with the Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 emissions standards and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. For engines from 175 to less than 750 hp, the Tier 4 Final regulations took effect on January 1, 2014. For engines from 49 to less than 75 hp, it took effect on January 1, 2013. Finally, for engines from 75 to less than 175 hp, Tier 4 the Tier 4 regulations took effect on January 1, 2015. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Therefore, no significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction is anticipated and no mitigation measures are recommended.

The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy consumed by the proposed project once it is operational would be associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with the project. Energy and natural gas consumption was estimated using default energy intensities by building type in CalEEMod. In addition, the proposed buildings would be constructed pursuant to 2022 CALGreen standards, which was considered in the CalEEMod inputs. Based on the Appendix A - Air Quality report from the CalEEMod, the annual estimated potential electricity demand associated with the proposed project is 1,890,665 kWh per year. The estimated potential increased natural gas demand associated with the proposed project is 7,530,719 kBTU

[46] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

per year. These are shown below in Tabe 3-3.

TABLE 3-3 PROPOSED PROJECT'S ENERGY CONSUMPTION

Energy Type	Annual Energy Consumption
Electrical Consumption	1,890,665 kWh/year
Natural Gas Consumption	7,530,719 kBTU/yr

Source: CalEEMod V.2022.1.1.24

No significant adverse impacts are identified or anticipated and no mitigation is recommended. *As a result, the impacts would be less than significant.*

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ● Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned commercial use, the implementation of similar programs would prove effective in reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements. In addition, the proposed project would be in conformance with Victorville's Climate Action Plan and Resource Element: Energy Conservation of the City General Plan. Both of these plans support energy conservation energy consumption and GHG emissions to become a more sustainable community and to meet the goals of AB 32. *As a result, the impacts will be less than significant.*

MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impacts on energy. As a result, no mitigation would be required.

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			✖	
i). Would the project, directly or indirectly, cause rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; Refer to Division of Mines and Geology Special Publication 42.				✖

ii). Would the project, directly or indirectly cause strong seismic ground shaking?			✖	
iii). Would the project, directly or indirectly cause seismic-related ground failure, including liquefaction.				✖
iv). Would the project, directly or indirectly cause landslides?				✖
B. Would the project result in substantial soil erosion or the loss of topsoil?			✖	
C. Would the project 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?			✖	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✖	
E. Would the project 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 waste water?				✖
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✖		

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on geology and soils if it results in any of the following:

- The proposed project would, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides?
- The proposed project would result in substantial soil erosion or the loss of topsoil.
- The proposed project would 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.
- The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
- The proposed project would 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.
- The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project's potential seismic and soils risk was evaluated in terms of the site's proximity to earthquake faults and unstable soils.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[47]

The City of Victorville is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Victorville is not on the list.[48] The nearest fault to the project site is the Helendale Fault, which is located approximately 18 miles east of the City.[49]

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from the epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is not located in a moderate liquefaction zone.[50] According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. *As a result, the impacts will be less than significant.*

i. *Would the project, directly or indirectly, cause 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. ● No Impact*

The City of Victorville is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of

[47] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[48] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.*

[49] California Department of Conservation. *The Helendale Fault.* http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/262/FER_262_Report_20160610.pdf.

[50] San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

Conservation website. The City of Victorville is not on the list.[51] The nearest fault to the project site is the Helendale Fault, which is located approximately 18 miles northeast of the City as shown in Exhibit 3-3.[52] The potential surface rupture is not present. *As a result, no impacts will occur.*

ii. *Would the project, directly or indirectly cause strong seismic ground shaking? ● Less than Significant Impact*

The City of Victorville is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Victorville is not on the list.[53] The nearest fault to the project site is the Helendale Fault, which is located approximately 18 miles northeast of the City as shown in Exhibit 3-3.[54] The potential ground shaking for the project site is not greater than that for the surrounding area. *As a result, the impacts will be less than significant.*

iii. *Would the project, directly or indirectly cause seismic-related ground failure, including liquefaction ●No Impact*

According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. The project site is not located within a liquefaction zone.[55] *As a result, no impacts will occur.*

iv. *Would the project, directly or indirectly cause landslides? ●No Impact*

According to the United States Geological Survey, a landslide is defined as the movement of a mass of rock, debris, or earth down a slope. The project site is level with little to no sloping in the surrounding area. *As a result, no impacts will occur*

B. *Would the project result in substantial soil erosion or the loss of topsoil? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of Bryman-Cajon and Mojave variant soils associations.[56] The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during

[51] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.*
[52] California Department of Conservation. *The Helendale Fault.* http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/262/FER_262_Report_20160610.pdf.
[53] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.*
[54] California Department of Conservation. *The Helendale Fault.* http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/262/FER_262_Report_20160610.pdf.
[55] San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.
[56] UC Davis. *SoilWeb*. Website accessed November 22, 2022.

site preparation and construction activities. Following development, a large portion of the project site would be paved over and landscaped. The project's construction will not result in soil erosion with adherence to those development requirements that restrict stormwater runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. Prior to initiating construction, contractors must obtain coverage under an NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). Both of these requirements are identified as mitigation measures. The County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. *As a result, the impacts will be less than significant.*

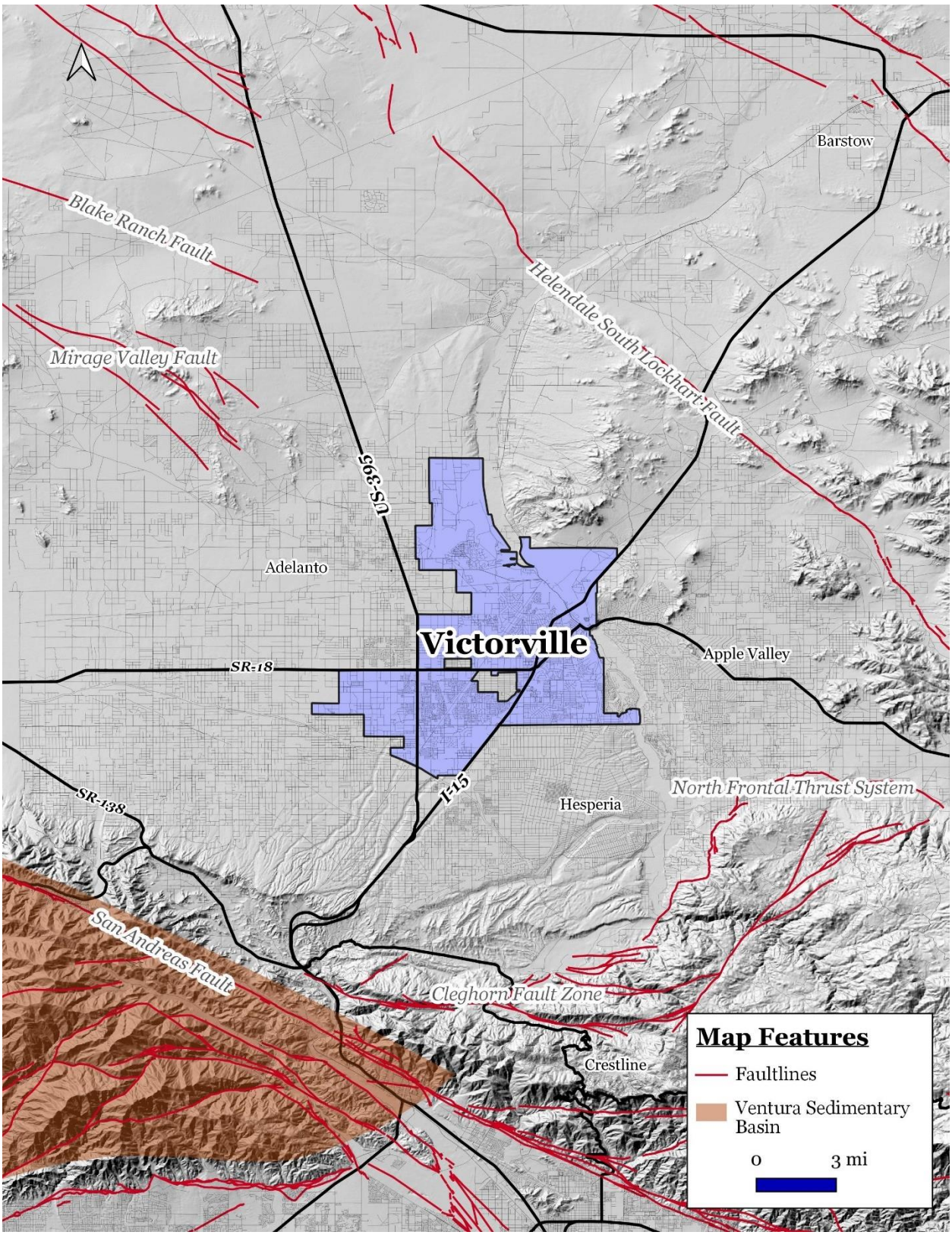

EXHIBIT 3-3 GEOLOGY MAP

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

C. *Would the project 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? ● Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.[57] The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink-swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. The proposed project site is located on a 27.35-acre (1,191,358 square feet) parcel that is currently vacant and undisturbed. *As a result, the impacts will be less than significant.*

D. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? ● Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is the property is underlain by soils of Bryman-Cajon and Mojave variant soils associations.[58] According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.[59] The applicant is required to adhere to all requirements detailed by the USDA. *As a result, the impacts will be less than significant.*

E. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? ● No Impact.*

The proposed project would be required to connect to the local sanitary sewer system located on Cactus Road and Diamond Road. No septic tank systems will be used for waste disposal. *As a result, no impacts will result.*

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● Less than Significant Impact with Mitigation.*

DUKE CRM assessed the proposed project for potentially significant impacts to paleontological and cultural resources under CEQA. Research and field survey did not identify any paleontological resources within the project site, and research suggests that the project area can be considered to have a low sensitivity for paleontological resources. Based on this assessment, no further paleontological investigation is warranted.

[57] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed November 22, 2022.

[58] UC Davis. *SoilWeb*. Website accessed November 22, 2022.

[59] United States Department of Agriculture. Natural Resources Conservation Service. Website accessed November 22, 2022.

No cultural resources are recorded within the project area, and the pedestrian survey did not identify any significant prehistoric or historical cultural resources. The project area was assessed as having a low sensitivity for cultural resources, and archaeological monitoring of ground disturbing activities is recommended.[60] Since it is possible that previously unrecognized resources could exist at the site, the proposed project would be required to the following mitigation measures:

- Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Victorville that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

- Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

- A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Victorville prior to building final.

- Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits and paleontological resources. In the event that field personnel encounter buried cultural materials or paleontological resources, work in the immediate vicinity of the find should cease and a qualified archaeologist/paleontologists must be retrained to assess the significance of the find. The qualified archaeologist/paleontologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist/paleontologist finds that any cultural resources present meet eligibility requirements for listing on the California register or the national register of historic places (national register), plans for the treatments, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

    - Historic-period artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
    - Historic-period structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
    - Pre-historic flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and/or cryptocrystalline silicates; and,
    - Dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, ground stone and fire affected rocks; and Human remains.

[60] Duke CRM. *Paleontological and Cultural Resources Assessment for the Victorville Warehouse Project*, City of Victorville, County of San Bernardino, California. November 18, 2022.

Adherence to the aforementioned mitigation measures would reduce the impacts to levels that are less than significant.

As a result, the impacts will be less than significant with mitigation.

MITIGATION MEASURES

The analysis determined that the proposed project would require the following mitigation measures to ensure the appropriate NPDES and SWPPP protocols are adhered to:

GEO Mitigation #1. Prior to issuance of a grading permit the applicant shall obtain coverage under the statewide general NPDES permit for control of construction and post-construction related storm water in accordance with the requirements of the Small MS4 General Permit.

GEO Mitigation #2. The Applicant shall prepare a project specific Storm Water Pollution Prevention Plan (SWPPP) as required in the NPDES permit and shall identify site-specific erosion and sediment control best management practices that will be implemented; The SWPPP shall be applicable to all areas of the project site including construction areas, access roads to and through the site, and staging and stockpile areas; Temporary best management practices for all components of the project must be implemented until such time as permanent post-construction best management practices are in place and functioning; and all excess sediment excavated as part of the Project that is not used onsite should be stockpiled in a location such that it will not be transported by wind or water into a surface water. An adequate combination of sediment and erosion control BMPs must be implemented and maintained to temporarily stabilize all stockpiled sediment until such time that it is reused and/or permanently stabilized.

GEO Mitigation #3. The applicant/developer shall prepare and implement a comprehensive Spill Prevention and Response Plan for the Project, subject to review and approval by the City Planner and City Engineer (or their designee) prior to the issuance of any associated building or grading permit. This plan should outline the site-specific monitoring requirements and list the best management practices necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.

Two mitigation measures (CUL Mitigation #1 and CUL Mitigation #2) included in Section 3.5, would also address the potential for the discovery of paleontological resources that may be encountered during ground disturbance.

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✖	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. They major GHG that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant, while it remains in the atmosphere it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.
- *Carbon Dioxide (CO_2)*. The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO_2 include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have increased the atmospheric concentrations of CO_2. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) Emissions of CO_2 from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010.
- *Methane (CH_4)*. CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and Chlorofluorocarbons (CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other human-related sources of methane production include fossil-fuel combustion and biomass burning.
- *Nitrous Oxide (N_2O)*. Concentrations of N_2O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and

vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.

- *Chlorofluorocarbons (CFC).* CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.
- *Hydrofluorocarbons (HFC).* HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Concentrations of HFC-152a are about 1 ppt. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.
- *Perfluorocarbons (PFC).* PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). Concentrations of CF_4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.
- *Sulfur Hexafluoride (SF_6).* SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2. Concentrations in the 1990s where about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

The MDAQMD mass emissions threshold is 10,000 metric tons (MT)) CO2e per year.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The proposed new building would have a total floor area 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[61] Table 3-4 shows unmitigated and mitigated GHG emissions and evaluates mitigated emissions against MDAQMD significance thresholds. Operational measures incorporate typical code required energy and water conservation features. Off-site traffic impacts are included in these emissions estimates, along with construction emissions amortized over 30 years. *As a result, the impacts will be less than significant.*

[61] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

TABLE 3-4 GREENHOUSE GAS EMISSIONS IMPACT SUMMARY

Source	GHG Emissions (Metric Tons/year)			
	CO2	CH4	N2O	MTCO2E
Long-Term – Mobile Emissions	391	0.03	0.02	399
Long-Term – Area Emissions	5.78	--	--	5.81
Long-Term – Energy Emissions	856	0.06	--	859
Long-Term – Operational Emissions	1,444	6.40	0.10	1,634
Short-Term – Construction Emissions	710	0.02	0.04	723
Amortized Over 30 Years				24.1
Total Annual Emissions				**1,658.1**
Significance Threshold				**10,000 MTCO2E/year**

Source: CalEEMod V.2022.1.1.24

B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? ● Less than Significant Impact*

The City of Victorville GHG Climate Action Plan (CAP) Checklist provides guidance in selecting and accounting for the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP Checklist assigns points for each option incorporated into a project. The point values correspond to the minimum emissions reduction expected from each feature. Each project must achieve *a minimum of 100 points* to be considered consistent with the CAP emission targets. The menu of features allows maximum flexibility and options for how development projects can implement the GHG reduction measures. Table 3-5 presents a list of the GHG reduction measure options and the associated point values in the GHG Checklist.

TABLE 3-5 GHG CLIMATE ACTION PLAN CHECKLIST (RELEVANT INDUSTRIAL)

Feature	Description	Point Value
Insulation	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	11
Windows	Enhanced Window Insulation (0.28 U-factor, 0.22 SHGC)	4
Cool Roof	Enhanced Cool Roof (CRRC Rated 0.2 aged solar reflectance, 0.75 thermal emittance)	7
Air Infiltration	Blower Door HERS Verified Envelope Leakage or equivalent	6
Thermal Storage	Enhanced Thermal Mass (20% of floor or 20% of walls 12" or more thick exposed concrete or masonry with no permanent installed floor covering such as carpet, linoleum, wood or other insulating materials)	14
Heating/Cooling Distribution System	Enhanced Duct Insulation (R-8)	5
Space Heating/Cooling Equipment	High Efficiency HVAC (EER 15/80% AFUE or 8.5 HSPF)	5
Water Heaters	Improved Efficiency Water Heater (0.675 Energy Factor)	8
Daylighting	All rooms within the customer areas have daylight (through use of windows, solar tubes, skylights, etc.) such that each room has at least 800 lumens of light during a sunny day	1
Artificial Lighting	Efficient Lights (25% of in-unit fixtures considered high efficacy. High efficacy is defined as 40 lumens/watt for 15 watt or less fixtures; 50 lumens/watt for 15-40 watt fixtures, 60 lumens/watt for fixtures >40watt)	5

Appliances	Energy Star Appliances	2
Building Placement	North/South alignment of building or other building placement such that the orientation of the buildings optimizes natural heating, cooling, and lighting.	4
Shading	At least 90% of south-facing glazing will be shaded by vegetation or overhangs at noon on Jun 21st	6
Water Efficient Landscaping	Only California Native landscape that requires no or only supplemental irrigation	5
Water Efficient Irrigation Systems	Weather based irrigation control systems combined with drip irrigation (demonstrate 20 reduced water use)	3
Toilets	Water Efficient Toilets/Urinals (1.5gpm) & Waterless Urinals (note that commercial buildings having both waterless urinals and high efficiency toilets will have a combined point value of 6 points)	6
Faucets	Water Efficient faucets (1.28gpm)	2
Cars	Level 3 480 volt AC Fast Chargers	8
Trucks	Level 3 DC Chargers for EV Class 8 (Heavy Duty) Truck	16
Total		118

Source: City of Victorville

The CAP Checklist that was completed for the proposed project (refer to Table 3-5) indicated the project would yield 118 points. Projects that yield 100 points pursuant to the City's GHG Screening Tables methodology are considered to be consistent with the CAP. The proposed project would, therefore, be consistent with the CAP. Because the proposed project is consistent with the CAP, the impacts would be less than significant.

The City of Victorville General Plan also includes a number of policies that would promote GHG reductions and sustainable practices in the City. All of the following policies listed below are from the Victorville 2008 General Plan. Relevant General Plan policies for the specific reduction measures the City selected are listed under the measure name (e.g., Wastewater-1).

- *Implementation Measure 7.2.1.2 (Building Energy Efficiency):* Minimize energy use of new residential, commercial, and industrial projects by requiring high efficiency heating, lighting, and other appliances, such as cooking equipment, refrigerators, furnaces, overhead and area lighting, and low NOX water heaters.
- *Implementation Measure 7.2.1.1 (Building Energy Efficiency):* Incorporate green building principles and practices, to the extent practicable and financially feasible, into the design, development and operation of all City owned facilities.
- *Implementation Measure 7.2.1.6 (Building Energy Efficiency):* Establish a program for retrofitting existing residential and commercial projects to bring existing structures into compliance with 2008 standards.
- *Implementation Measure 7.2.1.2 (Lighting Efficiency):* Minimize energy use of new residential, commercial, and industrial projects by requiring high efficiency heating, lighting, and other appliances, such as cooking equipment, refrigerators, furnaces, overhead and area lighting, and low NOX water heaters.
- *Implementation Measure 7.2.1.1 (Lighting Efficiency):* Incorporate green building principles and practices, to the extent practicable and financially feasible, into the design, development and operation of all City owned facilities.
- *Implementation Measure 7.2.1.6 (Lighting Efficiency):* Establish a program for retrofitting existing residential and commercial projects to bring existing structures into compliance with 2008 standards

- *Implementation Measure 7.2.1.9 (Lighting Efficiency):* Set target to retrofit City streetlights with goal of 100% replacement (High pressure sodium cut-off or similar streetlights).
- *Implementation Measure 7.2.1.10 (Lighting Efficiency):* Incandescent lighting is discouraged for all new construction; all City facilities should replace incandescent lighting with CF or LED lighting unless light fixture does not exist for particular use.
- *Implementation Measure 7.1.1.1 (All Electric Buildings):* Continue to work with energy companies and energy developers to develop non-fossil fuel reliant power generation plants within the Planning Area.
- *Implementation Measure 7.1.1.1 (Renewable Energy in New Industrial):* Continue to work with energy companies and energy developers to develop non-fossil fuel reliant power generation plants within the Planning Area.
- *Implementation Measure 7.1.1.3 (Renewable Energy in New Industrial):* Establish a photovoltaic target and require new construction to contribute to that target.
- *Implementation Measure 7.1.1.4 (Renewable Energy in New Industrial):* Require all new commercial or industrial development to generate electricity on site to maximum extent feasible.
- *Implementation Measure 7.1.1.1 (Solar Energy for Warehouse Space):* Continue to work with energy companies and energy developers to develop non-fossil fuel reliant power generation plants within the Planning Area.
- *Implementation Measure 7.1.1.3 (Solar Energy for Warehouse Space):* Establish a photovoltaic target and require new construction to contribute to that target.
- *Implementation Measure 7.1.1.4 (Solar Energy for Warehouse Space):* Require all new commercial or industrial development to generate electricity on site to maximum extent feasible.

This project will not adversely affect the implementation of those policies. As a result, the project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. *As a result, the impacts will be less than significant.*

MITIGATION MEASURES

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✖	

C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✖
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✖
E. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✖
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hazards and hazardous materials if it results in any of the following:

- The proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project would 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.
- The proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- The proposed project would 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.
- The proposed project would result in a safety hazard or excessive noise for people residing or working in the project area 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.
- The proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- The proposed project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and

households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. A total of 70 dock-high doors would be provided along the buildings south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates.[62]

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. *As a result, the impacts will be less than significant.*

B. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ● Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols.

The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the City prior to the issuance of the Occupancy Permit. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Envirostor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project's construction phase is remote. *As a result, the impacts will be less than significant.*

C. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials,*

[62] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

substances, or waste within one-quarter mile of an existing or proposed school? ● No Impact.

The nearest school to the project site is Melva Davis Academy of Excellence located 4,000 feet east of the project. Due to the proximity of the project site from the nearest school, the proposed project will not create a hazard. *As a result, no impacts are anticipated.*

D. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ● No Impact.*

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.[63] *As a result, no impacts will occur.*

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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ● No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport.[64] The nearest airport to the project site is the Southern California Logistics Airport is located approximately 3.7 miles northwest of the project site.[65] The project will not introduce a structure that will interfere with the approach and take off airplanes utilizing any regional airports. *As a result, no impacts will occur.*

F. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

At no time will any adjacent street be completely closed to traffic during the proposed project's construction. The adjacent roadways are currently unimproved. In addition, all construction staging must occur on-site. *As a result, no impacts will occur.*

G. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? ● No Impact.*

[63] CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).* http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm.
[64] Toll-Free Airline. *San Bernardino Public and Private Airports, California.* http://www.tollfreeairline.com/california/sanbernardino.htm.

[65] Google Maps. Website accessed December 9,2022.

The project site is located in a built-up zone and the adjacent properties directly north of the project site are developed. The project site along with the entire city is located within a "moderate fire hazard severity zone" and Local Responsibility Area (LRA).[66] *As a result, no impacts will result.*

MITIGATION MEASURES

The analysis of potential impacts related to hazards and hazardous materials indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✖	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✖	
C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner or,			✖	
i) Would the project result in substantial erosion or siltation on- or off-site;			✖	
ii) Would the project substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site.			✖	
iii) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			✖	
iv) Would the project impede or redirect flood flows?			✖	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✖
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✖

[66] CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*. http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hydrology and water quality if it results in any of the following:

- The proposed project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- The proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- The proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows.
- The proposed project would risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.
- The proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[67]

The project Applicant will be required to adhere to Chapter 10.30.210 - Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. *As a result, the impacts will be less than significant.*

[67] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ● Less than Significant Impact.*

No new direct construction-related impacts to groundwater supplies, or groundwater recharge activities would occur as part of the proposed project's implementation. Water used to control fugitive dust will be transported to the site via truck. No direct groundwater extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, there would be no direct groundwater withdrawals associated with the proposed project's implementation. *As a result, the impacts will be less than significant.*

C. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces? ● Less than Significant Impact.*

The proposed project's location will be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped though there are no stream channels or natural drainages that occupy the property. The site would be designed so the proposed hardscape surfaces (the building and paved areas) will percolate into the landscape parkway areas. *As a result, the impacts will be less than significant.*

i. *Would the project result in a substantial erosion or siltation on- or off-site; ● Less than Significant Impact*

The project applicant will be required to abide by Victorville's City Ordinance Chapter 10.30.210 that requires all applicants for projects involving construction activities, regardless of size, to submit an erosion and sediment control plan ("ESCP") to the City for review and approval as mentioned in subsection A. *As a result, the impact will be less than significant.*

ii. *Would the project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; ● Less than Significant Impact*

The project's construction and operation will be restricted to the designated project site and the project will not increase the amount of any stream or river that would lead to on- or off-site siltation or erosion. Once implemented, the proposed project will change the site's drainage characteristics. Predevelopment, the entire site is covered over in earth and pervious surfaces. Following development, the majority of the site, with the exception of the landscaped areas consisting of 60,663 square feet, will be covered over in impervious surfaces. *As a result, the impacts will be less than significant.*

iii. *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; ● Less than Significant Impact*

All operations will occur inside the proposed building and will not contribute to runoff water and all zoning ordinances related to polluted runoff will be followed. *As a result, the impacts will be less than significant*.[68]

iv. *Would the project impede or redirect flood flows? ● Less than Significant Impact*

The proposed project is situated in a Zone X flood zone, an area of minimal flood hazard.[69] The nearest flood zone, the Mojave river, is situated 0.52 miles to the southwest and the project's construction and operation will be restricted to the project site. *As a result, the impacts will be less than significant.*

D. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? ● No Impact.*

As mentioned previously, the proposed project site is not located within a Flood Hazard zone.[70] The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 65 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami.[71] *As a result, no impacts are anticipated.*

E. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ● No Impact.*

The proposed project is required to be in compliance with Chapter 10.30.210 of the City of Victorville Municipal Code. In addition, the project's operation will not interfere with any groundwater management or recharge plan because there are no active groundwater management recharge activities on-site or in the vicinity. *As a result, no impacts are anticipated.*

MITIGATION MEASURES

The proposed project's location will be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site is presently undeveloped though there are no stream channels or natural drainages that occupy the property. The project Applicant will be required to adhere to Chapter 10.30.210 - Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. As a result, no mitigation is required.

[68] Steeno Design Studio Inc. Victorville Warehouse. Site Plan. Sheet A-0.

[69] Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2022.

[70] Ibid

[71] Google Earth. Website accessed December 1, 2022.

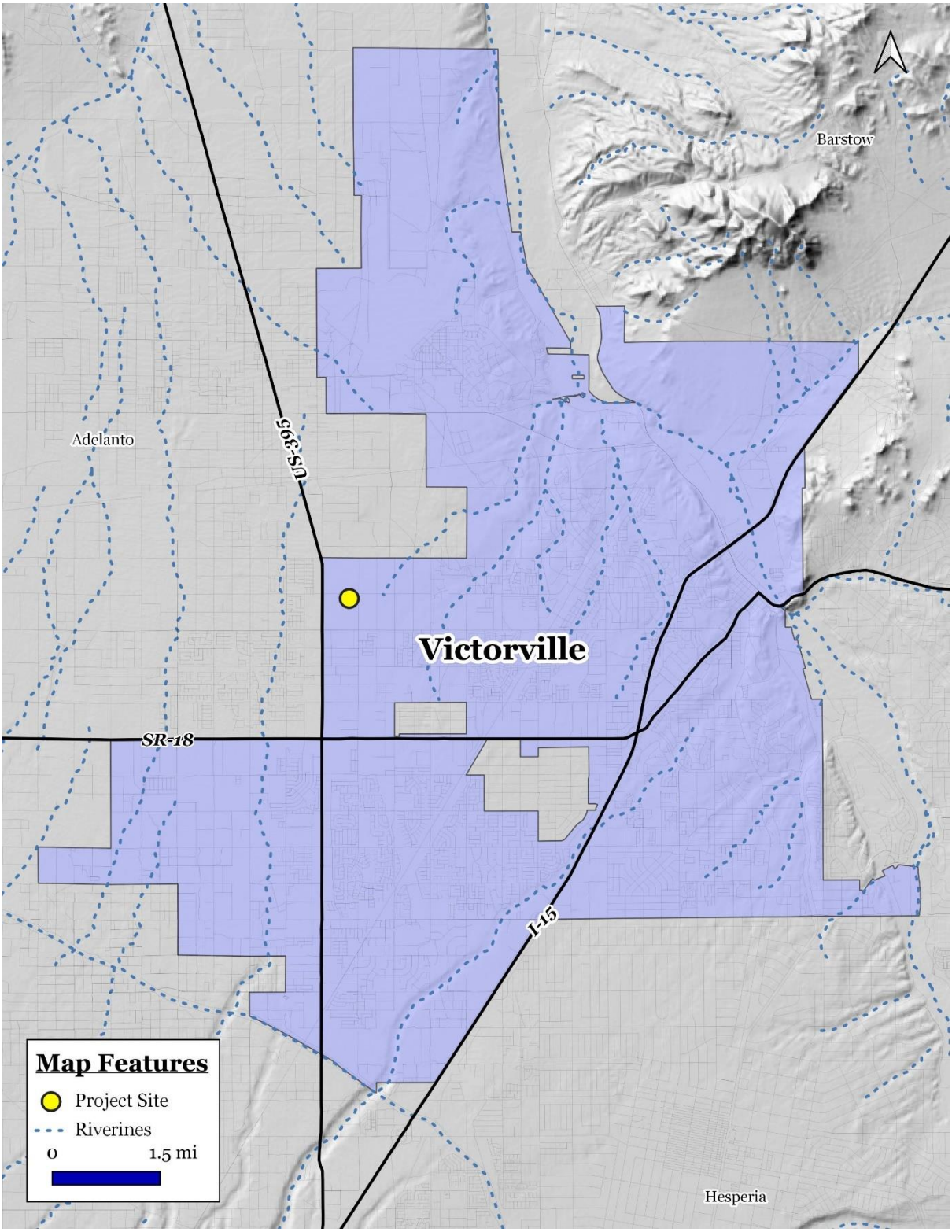

EXHIBIT 3-4 WATER RESOURCES MAP

SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✖
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[72] The proposed project site is zoned M-2T (Heavy Manufacturing Transitional). Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* The proposed project site is bounded on the north by the unimproved Cactus Road right-of-way. Vacant land abuts the aforementioned roadway further north. This land is zoned as *M-1T (Light Manufacturing)*.[73]

[72] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[73] Google Maps and City of Victorville Zoning Map. Website accessed on November 20, 2022.

- *East of the project site:* The proposed project site is bounded on the east by the unimproved Mesa Linda Avenue right-of-way. Vacant, undisturbed land is situated further east, east of the aforementioned roadway right-of-way. This land is zoned as *M-1T (Light Manufacturing)*.[74]
- *South of the project site:* Vacant undeveloped land is located to the south of the project site. This area is zoned as *M-2T (Heavy Manufacturing Transitional)*.[75]
- *West of the project site:* Vacant undeveloped land is located to the south of the project site. This area is zoned as *M-2T (Heavy Manufacturing Transitional)*.[76]

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood. *As a result, no impacts will result.*

B. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ● No Impact.*

The proposed project is within the *M-2T (Heavy Manufacturing Transitional)* zone district and will not conflict with any land use plan. The maximum development density for the M-2T zone is governed by lot coverage requirements which permit structures to cover up to 60% of the total site area. The M-2T Zone District does not have a maximum lot coverage. The maximum building height within this land use district is 50 feet.[77] The development standards of the M2 Heavy Industrial zone district are summarized below in Table 3-6. The City of Victorville Zoning Map is provided on the following page in Exhibit 3-5.

TABLE 3-6 M2 ZONING REQUIREMENTS

Requirements	Standard	Conformity
Maximum Lot Coverage	60%	Yes
Net Lot Area	20,000 sq. ft.	Yes
Minimum Lot Width	75 feet	Yes
Minimum Lot Depth	NA	Yes
Front Yard Setback	30 feet	Yes
Side Yard and Rear Yard Setbacks	NA	Yes
Maximum Building Height	50 feet	Yes

Source: City of Victorville Zoning Code

The proposed development would be consistent with the City of Victorville General Plan and Zoning Ordinance. *As a result, no impacts would result.*

[74] Google Maps and City of Victorville Zoning Map. Website accessed on November 20, 2022.

[75] Ibid.

[76] Ibid.

[77] Victorville, City of. *Victorville General Plan 2030 , Land Use Element*. October 21, 2008

MITIGATION MEASURES

The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✖
B. Would the project 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?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would 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.

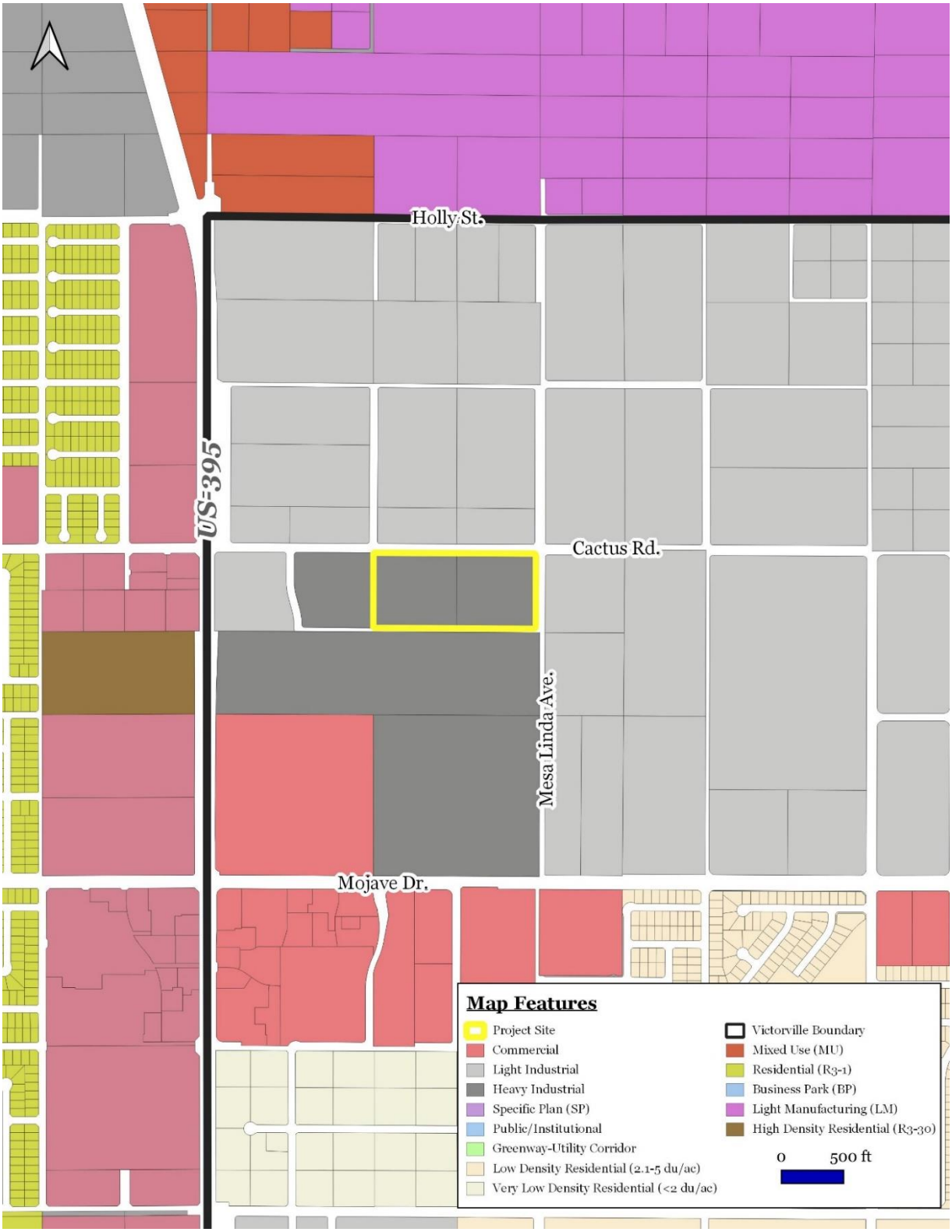

EXHIBIT 3-5 LAND USE AND ZONING MAP

SOURCE: CITY OF VICTORVILLE

The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses.[78]

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[79] In addition, the project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[80] The project site is located within Mineral Resource Zone (MRZ-3A), which means there may be significant mineral resources present.[81] As indicated previously, the site is undeveloped and there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

[78] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[79] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14.*

[80] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14.*

[81] California Department of Conservation. *Mineral Land Classification Map for the Victorville Quadrangle*. Map accessed August 21, 2021.

B. *Would the project 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? ● No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the approval of the proposed project and its subsequent implementation. As a result, no mitigation measures are required.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✖		
B. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?			✖	
C. For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on noise if it results in any of the following:

- The proposed project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- The proposed project would result in the generation of excessive ground borne vibration or ground borne noise levels.
- For a proposed project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to

represent the threshold for human sensitivity. Noise level increases of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. Noise sensitive land uses in the area are shown in Exhibit 3-6. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. Noise levels associated with common everyday activities are illustrated in Exhibit 3-7.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ● Less than Significant Impact with Mitigation.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The proposed new building would have a total floor area 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV) parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces.[82]

The primary sources of noise in the Victorville Planning Area are freeways and roadways, railroad traffic, SCLA aircraft operations, and stationary sources, Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, building equipment noise (air conditioning units, and other equipment), and other noises typically associated with commercial development. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.[83]

[82] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[83] Bugliarello, et. al. *The Impact of Noise Pollution,* Chapter 127, 1975.

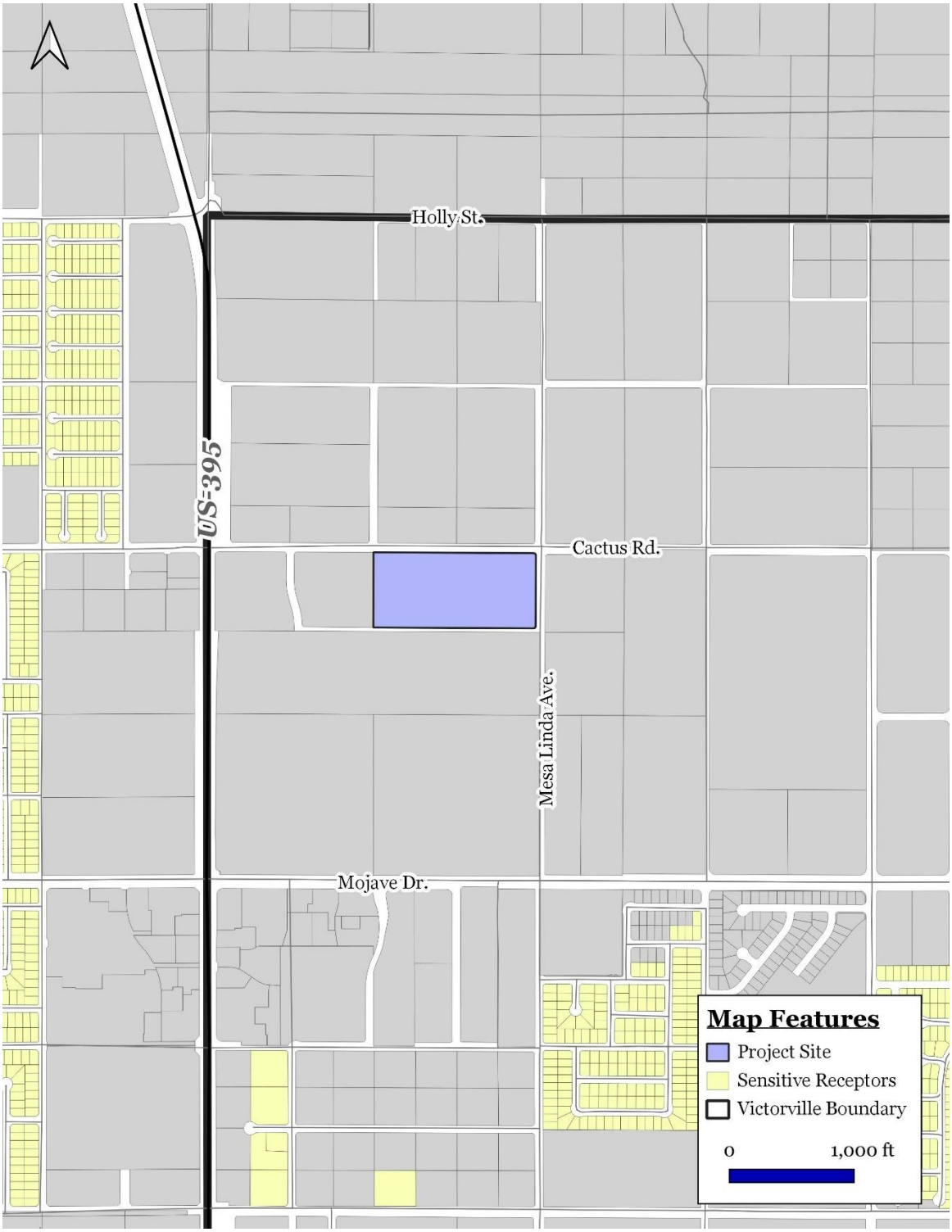

EXHIBIT 3-6 NOISE SENSITIVE LAND USES

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

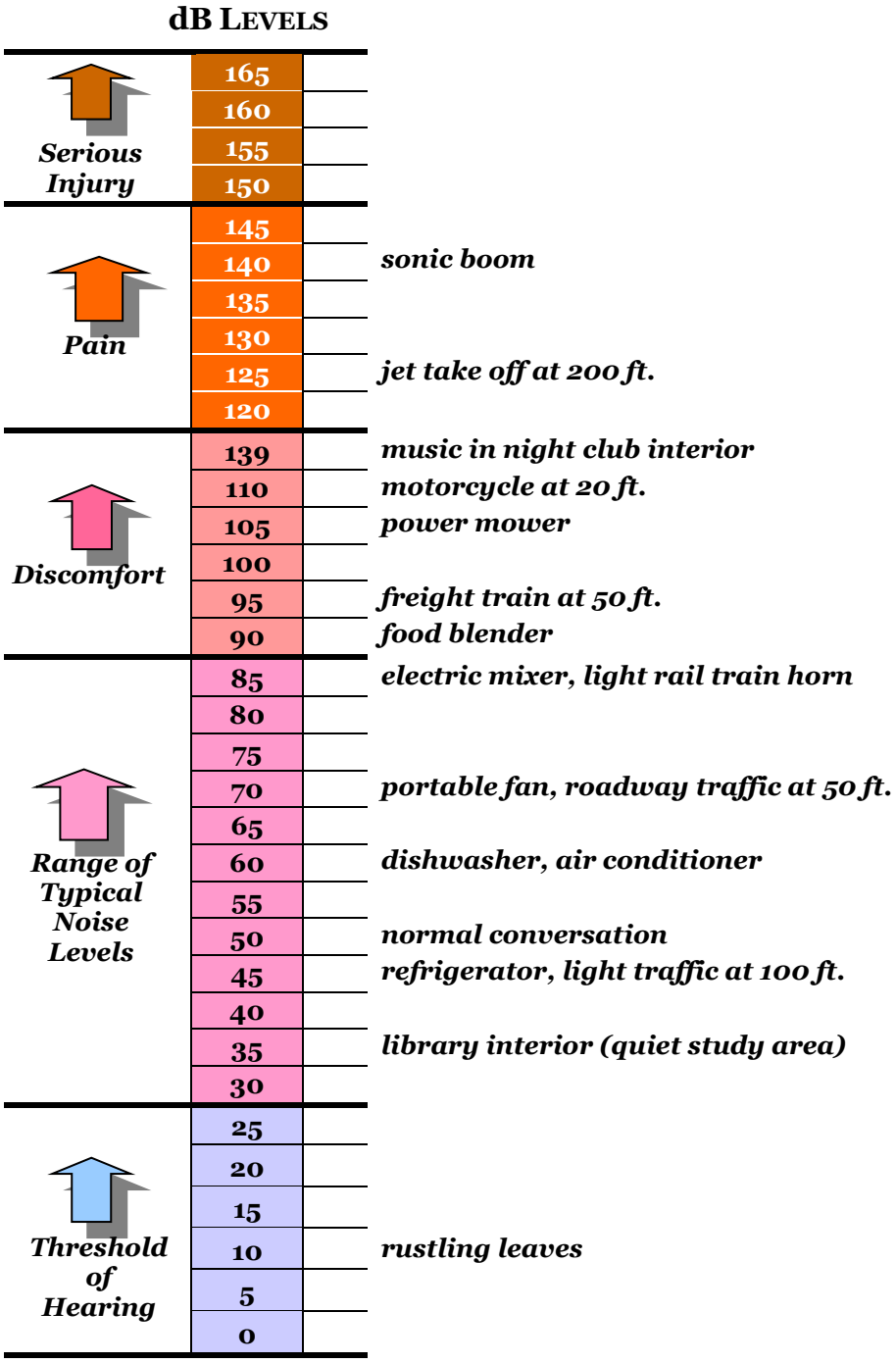

EXHIBIT 3-7 TYPICAL NOISE SOURCES AND LOUDNESS SCALE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

The City of Victorville Noise Control Ordinance includes the following requirements with respect to noise exposure and control:

- *13.01.050 - Noise levels prohibited.* Noise levels shall not exceed the ambient noise levels in Section 13.01.040 by the following dB(A) levels for the cumulative period of time specified: Less than 5dB(A) for a cumulative period of more than thirty minutes in any hour; Less than 10 dB(A) for a cumulative period of more than fifteen minutes in any hour; Less than 15 dB(A) for a cumulative period of more than five minutes in any hour; Less than 20 dB(A) for a cumulative period of more than one minute in any hour; 20 dB(A) or more for any period of time.

13.01.060 - Noise source exemptions. The following activities shall be exempted from the provisions of this chapter: All mechanical devices, apparatus or equipment used, related to or connected with emergency machinery, vehicle or work. The provisions of this regulation shall not preclude the construction, operation, maintenance and repairs of equipment, apparatus or facilities of park and recreation projects, public works projects or essential public works services and facilities, including those utilities subject to the regulatory jurisdiction of the California Public Utilities Commission. Activities conducted on the grounds of any elementary, intermediate, or secondary school or college. Outdoor gatherings, public dances and shows, provided said events are conducted pursuant to a permit as required by this code. Activities conducted in public parks and public playgrounds, provided said events are conducted pursuant to a permit as required by this code. Any activity to the extent regulation thereof has been preempted by state or federal law. Trac on any roadway or railroad right-of-way. The operation of the Southern California Logistics Airport. Construction activity on private properties that are determined by the director of building and safety to be essential to the completion of a project

13.01.070 - Notice and penalties. Any person violating any of the provisions or failing to comply with the requirements of this chapter, is guilty of a civil penalty, punishable in accordance with Chapter 1.05. In addition, in the discretion of the city attorney and based upon the specific facts and circumstances presented to him or her, any such violation may be charged as an infraction subject to the penalties contained in Section 1.04.010

The only short-term construction noise will be limited to the grading during the site preparation phases and the erection of the building. Nevertheless, the following mitigation will be required in order to further reduce construction noise:

- The Applicant must ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.

Adherence to the above-mentioned mitigation will reduce potential impacts stemming from the project's construction to levels that are less than significant.

B. *Would the project result in generation of excessive ground borne vibration or ground borne noise levels? ● Less than Significant Impact.*

The construction of the proposed project will result in the generation of vibration and noise, though the vibrations and noise generated during the project's construction will not adversely impact an sensitive receptors. The background vibration velocity level in residential areas is usually around 50 vibration velocity level (VdB). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximately dividing line between barely perceptible and distinctly perceptible levels for many people. Sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors causes most perceptible indoor vibration.

Construction activities may result in varying degrees of ground vibration, depending on the types of equipment, the characteristics of the soil, and the age and construction of nearby buildings.

The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernible in areas located near the construction site. A possible exception is in older buildings where special care must be taken to avoid damage. Table 3-7 summarizes the levels of vibration and the usual effect on people and buildings. The U.S. Department of Transportation (U.S. DOT) has guidelines for vibration levels from construction related to their activities and recommends that the maximum peak-particle-velocity (PPV) levels remain below 0.05 inches per second at the nearest structures. PPV refers to the movement within the ground of molecular particles and not surface movement. Vibration levels above 0.5 inches per second have the potential to cause architectural damage to normal dwellings. The U.S. DOT also states that vibration levels above 0.015 inches per second (in/sec) are sometimes perceptible to people, and the level at which vibration becomes an irritation to people is 0.64 inches per second.

TABLE 3-7 COMMON EFFECTS OF CONSTRUCTION VIBRATION

Peak Particle Velocity (in/sec)	Effects on Humans	Effects on Buildings
<0.005	Imperceptible	No effect on buildings
0.005 to 0.015	Barely perceptible	No effect on buildings
0.02 to 0.05	Level at which continuous vibrations begin to annoy occupants of nearby buildings	No effect on buildings
0.1 to 0.5	Vibrations considered unacceptable for persons exposed to continuous or long-term vibration.	Minimal potential for damage to weak or sensitive structures
0.5 to 1.0	Vibrations considered bothersome by most people, tolerable if short-term in length	Threshold at which there is a risk of architectural damage to buildings with plastered ceilings and walls. Some risk to ancient monuments and ruins.
1.0 to 2.0	U.S. Bureau of Mines data indicates that blasting vibration in this range will not harm most buildings. Vibrations considered unpleasant by most people.	Most construction vibration limits are in this range.
>3.0	Vibration is unpleasant	Potential for architectural damage and possible minor structural damage

Source: U.S. Department of Transportation

Typical levels from vibration generally do not have the potential for any structural damage. Some construction activities, such as pile driving and blasting, can produce vibration levels that may have the potential to damage some vibration sensitive structures if performed within 50 to 100 feet of the structure. The reason that normal construction vibration does not result in structural damage has to do with several issues, including the frequency vibration and magnitude of construction related vibration. Unlike earthquakes, which produce vibration at very low frequencies and have a high potential for structural damage, most construction vibration is in the mid- to upper- frequency range, and therefore has a lower potential for structural damage.

The project's implementation will not require deep foundations since the underlying fill soils will be removed and the height of the proposed buildings will be limited (a single level). The new building would be constructed over a shallow foundation that will extend no more than three to four feet bgs. The use of shallow foundations precludes the use of pile drivers or any auger type equipment. However, other

vibration generating equipment may be used on-site during construction. As stated above, the project will require the use of excavators, loaders, bulldozers, and haul trucks. Various types of construction equipment have been measured under a wide variety of construction activities with an average of source levels reported in terms of velocity levels as shown in Table 3-8. Although the table gives one level for each piece of equipment, it should be noted that there is a considerable variation in reported ground vibration levels from construction activities. The data in Table 3-8 does provide a reasonable estimate for a wide range of soil conditions. Based on Transit Noise and Vibration Impact Assessment, a vibration level of 102 VdB (vibration decibels, or 0.5 inches per second [in/sec]) is considered safe and would not result in any construction vibration damage.

TABLE 3-8 VIBRATION SOURCE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT

Construction Equipment		PPV @25 ft. (inches/sec.)	Vibration (VdB) @ 25 ft.
Pile Driver (impact)	Upper range	1.58	112
	Typical	0.644	104
Pile Drive (Sonic)	Upper range	0.734	105
	Typical	0.170	93
Clam Shovel Drop		0.202	94
Large Bulldozer		0.089	87
Caisson Drilling		0.089	87
Loaded Trucks		0.076	86
Small Bulldozer		0.035	79

Source: Noise and Vibration During Construction

The project will be required to adhere to all pertinent City noise control regulations. In addition, the cumulative traffic associated with the proposed project will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). Once in operation, the proposed project will not significantly raise ground borne noise levels. Slight increases in ground-borne noise levels could occur during the construction phase. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts. *As a result, the impacts will be less than significant.*

C. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? ● No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or private airport. The project site is located approximately 3.7 miles south of the Southern California Logistics Airport. The proposed use is not considered to be a sensitive receptor. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. *As a result, no impacts would occur.*

MITIGATION MEASURES

The following mitigation would be required in order to further reduce construction noise:

NOI Mitigation #1. The Applicant must ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✖
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on population and housing if it results in any of the following:

- The proposed project would induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

- The proposed project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area.[84] Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development*. The site is currently undeveloped and undisturbed. None of this land is designated

[84] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

for residential land uses.

- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only or are already planned. The proposed project will be required to pay its fair share.

- *Extension of infrastructure and other improvements*. The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only. At present, existing water sewer connections will need to be extended to serve the project site. The project's potential utility impacts are analyzed in Section 3.19.

- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants. The project's potential utility impacts are further analyzed in Section 3.19.

- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.

- *Additional population growth leading to increased demand for goods and services*. The project will result in a limited increase in employment which can be accommodated by the local labor market.

- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The newly established roads and existing utility lines will serve the project site only and will not extend into undeveloped areas. The proposed project will not result in any unplanned growth. *Therefore, no impacts would result.*

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ● No Impact.*

No housing units will be permitted, and none will be displaced as a result of the proposed project's implementation. *Therefore, no impacts would result.*

MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			✖	
i). Would the project result in substantial adverse physical impacts associated with Fire protection?			✖	
ii). Would the project result in substantial adverse physical impacts associated with Police protection?			✖	
iii). Would the project result in substantial adverse physical impacts associated with Schools?			✖	
iv). Would the project result in substantial adverse physical impacts associated with Parks?			✖	
v). Would the project result in substantial adverse physical impacts associated with Other public facilities?			✖	

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- The proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks or other public facilities.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the

total site area and this landscaping would be provided around the site's perimeter and around the new building.[85]

i). *Would the project have fire protection? Less than Significant Impact.*

The City of Victorville is served by the Victorville Fire Department that operates out of five stations. The Department operates a fleet of four Medic Engines, one medic truck, and one Medic squad. The staffing consists of 51 firefighting personnel. Fire station 312 is the closest fire department to the project site, located 2.6 miles to the southeast of the project site**.** The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires). The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by City Fire officials to ensure adequate fire service and safety as a result of project implementation. *As a result, the impacts will be less than significant.*

ii). *Would the project have police protection? Less than Significant Impact.*

Law enforcement services within the City are provided by the Victorville Sheriff's Department which serves the community from one police station located 4 miles to the southeast of the project site. The proposed project will also be required to comply with the County and City security requirements. The proposed project would only place an incremental demand on police protection services since the project would be secured at all times. The building and layout design would include crime prevention features, such as nighttime security lighting and secure parking facilities. A sliding security gate will be installed at the entrances to the loading dock area. *As a result, the impacts will be less than significant.*

iii). *Would the project be near schools? Less than Significant Impact.*

The nearest school to the project site is Melva Davis Academy of Excellence, located 4,000 feet east of the project. Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The project site is industrial in nature and will not result in any direct school enrollment impacts (as opposed to a residential uses). Pursuant to SB-50, payment of fees to the applicable school district is considered full mitigation for project-related impacts. As *a result, the impacts will be less than significant.*

iv). *Would the project be near parks? Less than Significant Impact.*

The nearest park to the project site is Brentwood Park located 2.05 miles southeast of the project site. The proposed project will not result in any local increase in residential development (directly or indirectly) that could potentially impact the local recreational facilities. *As a result, the impacts will be*

[85] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

less than significant.

v). *Would the project have other public facilities? Less than Significant Impact.*

The proposed project will not create direct local population growth that could potentially create demand for other governmental service. No housing units will be displaced or constructed as part of the proposed project's implementation. *As a result, the impacts will be less than significant.*

MITIGATION MEASURES

The analysis of public service impacts indicated that no significant adverse impacts are anticipated, and no mitigation is required with the implementation of the proposed project.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✖
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on recreation if it results in any of the following:

- The proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

- The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The

site encompasses some native plants, and some non-native grasses. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[86] Due to the industrial nature of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. The nearest park to the project site is Brentwood Park located 2.05 miles southeast of the project site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts are anticipated.

B. *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ● No Impact.*

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site and, as a result, no impacts will occur.

MITIGATION MEASURES

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		✖		
B. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?			✖	
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✖	
D. Would the project result in inadequate emergency access?				✖

[86] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on transportation and circulation if it results in any of the following:

- The proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- The proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- The proposed project would result in inadequate emergency access.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. A total of 70 dock-high doors would be provided along the buildings south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be electric vehicle (EV) parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces.[87] The following roadways provide local and regional access to the project within the study area:

- *Highway 395* is a major north-south primarily four-lane road (two lanes in each direction with a with turn pockets at key intersections). Highway 395 is identified as a super arterial on the City of Victorville Circulation Plan. The posted speed limit within the project area is 55 mph.
- *Mojave Drive* is a major east-west primarily four-lane road (two lanes in each direction with a raised curbed median, and with turn pockets at key intersections) within the project vicinity. Mojave Drive is identified as a super arterial on the City of Victorville Circulation Plan. The posted speed limit is 60 mph.
- *Cactus Road* is a local east-west primarily two-lane road (one lane in each direction with a turn pocket at key intersections). A segment of Cactus Road starting at Highway 395 to approximately

[87] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

1,300 feet east is identified as an arterial on the City of Victorville Circulation Plan. Cactus Road 395 is identified as a collector on the City of Victorville Circulation Plan.

- *Mesa Linda Avenue* is a local north-south primarily two-lane road (one lane in each direction), in the project area. Mesa Linda Avenue is identified as a collector on the City of Victorville Circulation Plan. Currently Mesa Linda Avenue is a dirt road north of Mojave Avenue. It will provide direct access to the project site.

To help select a trip generation rate for the proposed project representative of the range of potential owners/tenants, the average of the rates for all warehouse types in the ITE Trip Generation manual and the average of the rates for all warehouse types except High-Cube Fulfillment Sort Facility—the most intensive type of warehouse which is not expected for the proposed project. The secondary average rate (excluding High-Cube Fulfillment Sort Facility) represents two thirds the ITE warehouse types and covers a broad range of tenant types and operations.

Table 3-9 summarizes the estimated trip generation of the proposed project for an average weekday, and weekday AM (7-9 AM) and PM (4-6 PM) peak hours, based on the secondary average rates identified in Table 5-1. The proposed warehouse complex would generate about 950 vehicle trips per day and 99 vehicle trips in both the AM and PM peak hours. It is standard practice to convert vehicle trips to passenger car equivalents (PCEs) for intersection capacity analysis. This conversion reflects the effects of large vehicles on intersection operations not just from the physical space a truck occupies but also from their effect on the intersection's saturation flow rate due to the slower acceleration of trucks. When converted to PCEs, the Cactus Warehouse generates about 1,350 daily PCEs, 139 PCEs in the AM peak hour, and 140 PCEs in the PM peak hour.

TABLE 3-9 TRIP GENERATION

Use	Floor Area (KSF)	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Warehouse (ITE Land Use Category 150)	405.89	2.36	0.18	0.06	0.24	0.07	0.17	0.24
		Total Vehicle Trip Generation						
		958	76	23	99	28	71	99
	Mode Share	**Total Project Trip Generation by Vehicle Type**						
Passenger Cars (Percent of Total)	74.21%	711	56	17	73	21	53	73
2-Axle Trucks (Percent of Total)	4.55%	44	3	1	4	1	3	4
3-Axle Trucks (Percent of Total)	4.18%	40	3	1	4	1	3	4
4-Axle Trucks (Percent of Total)	17.04%	163	13	4	17	5	12	17
	PCE Factor	**Total Project Trip Generation in PCE**						
Passenger Cars	1.0	711	56	17	73	21	53	73
2-Axle Trucks	1.5	65	5	2	7	2	5	7
3-Axle Trucks (Percent of Total)	2.0	80	6	2	8	2	6	8
4-Axle Trucks (Percent of Total)	3.0	490	39	12	50	15	36	50
Total		**1,346**	**106**	**33**	**139**	**40**	**100**	**140**

Currently, future Cantina Road, Cactus Road, and Mesa Linda Avenue are unimproved roads. The project's proposed circulation and access plan includes extending and constructing the southern half of Cactus Road

from end of its improved section (about 360 feet east of Highway 395) to Mesa Linda Avenue; constructing the western half of Mesa Linda Avenue from Cactus Road to the southern edge of the property; and constructing the eastern half of Cantina Road from Cactus Road to the southern edge of the property. The intersection of Mojave Drive at Mesa Linda Avenue is anticipated to be Signalized based on the project specific improvements the adjacent project Mojave 68 is conditioned to construct prior to the construction of the proposed project.

- *Highway 395 / Mojave Drive:* Add exclusive westbound right turn lane; Convert the current shared through-right-turn lane to a through lane only; provide right turn overlap phasing for the westbound and northbound right turns; optimize signal timing

- *Mojave Drive / Mesa Linda Avenue:* Install traffic signal control with protected left turn phasing on all approaches (To be established by Mojave 68 Project, which has been conditioned to install the traffic signal.)

- The projects contribution in the Near-Term is anticipated to be 21.0% and in the Mid-Term is anticipated to be 5.8% of the cost of the improvements to Highway 395 at Mojave Drive. In the event that the Mojave 68 Project is delayed, the project contribution in the Near-Term is anticipated to be 29.7% and in the Mid-Term is anticipated to be 8.1% of the cost of the improvements to Mojave Drive at Mesa Linda Avenue.

The impacts would be less than significant the implementation of the aforementioned mitigation.

B. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? ● Less than Significant Impact.*

Victorville uses screening criteria to determine if a development project is required to conduct a VMT analysis to identify potentially significant transportation impacts under CEQA. If a project satisfies one the criteria described below it is considered to have a less than significant impact on VMT and does not require a VMT analysis. Victorville has two criteria for screening projects from requiring a VMT analysis.

- *Screening for Net Increase in Daily Vehicle Trips*. As shown in Table 3-9, the project's net increase in daily trips is about 958 trips which is under the threshold of 1,285 daily trips established in the City's guidelines. Based on this criterion, the project is screened from requiring a VMT analysis.

- *Screening for Net Increase in New Development*. The proposed project is comprised of warehousing with a total floor area of 405,889 square feet which is less than the City's threshold of 829,000 square feet for warehousing. Based on this criterion, the project is screened from being required to conduct a VMT analysis.

As a result, the impacts would be less than significant.

C. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ● Less than Significant Impact.*

A total of 70 dock-high doors would be provided along the buildings south-facing elevation. The truck maneuvering areas would be located further south of the loading docks. The loading docks and truck

maneuvering area would be secured by security gates. There would be a total of 178 parking spaces provided. Of this total, 164 spaces would be standard 9'x20' parking spaces, 8 spaces would be EV parking spaces, and 6 spaces would be ADA 9'x20' parking spaces. There would also be a total of 91 parking spaces reserved for trailer trucks including 6 EV truck parking spaces. Vehicular access to the project would be provided by a total of four new driveway connections. Two 40-foot wide driveway connections would be provided along the south side of Cactus Road. One 50-foot wide driveway connection would be provided with the east side of Cantina Road. Finally, one 50-foot wide driveway connection would be provided with the west side of Mesa Linda Avenue.[88]

Currently, future Cantina Road, Cactus Road, and Mesa Linda Avenue are unimproved roads. The project's proposed circulation and access plan includes extending and constructing the southern half of Cactus Road from end of its improved section (about 360 feet east of Highway 395) to Mesa Linda Avenue; constructing the western half of Mesa Linda Avenue from Cactus Road to the southern edge of the property; and constructing the eastern half of Cantina Road from Cactus Road to the southern edge of the property. The intersection of Mojave Drive at Mesa Linda Avenue is anticipated to be Signalized based on the project specific improvements the adjacent project Mojave 68 is conditioned to construct prior to the construction of the proposed project.

The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. *As a result, the potential impacts will be less than significant.*

D. *Would the project result in inadequate emergency access? ● No Impact.*

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts are associated with the proposed project's implementation.*

MITIGATION MEASURES

The intersection of Mojave Drive at Mesa Linda Avenue is anticipated to be Signalized based on the project specific improvements the adjacent project Mojave 68 is conditioned to construct prior to the construction of the proposed project. As a result, the following mitigation measures are required:

TRA Mitigation #1. *Highway 395 / Mojave Drive:* Add exclusive westbound right turn lane; Convert the current shared through-right-turn lane to a through lane only; provide right turn overlap phasing for the westbound and northbound right turns; optimize signal timing.

TRA Mitigation #2. *Mojave Drive / Mesa Linda Avenue:* Install traffic signal control with protected left turn phasing on all approaches (To be established by Mojave 68 Project, which has been conditioned to install the traffic signal.)

TRA Mitigation #3. The projects contribution in the Near-Term is anticipated to be 21.0% and in the Mid-Term is anticipated to be 5.8% of the cost of the improvements to Highway 395 at Mojave Drive. In the event that the Mojave 68 Project is delayed, the project contribution in the Near-Term is anticipated to be 29.7% and in the Mid-Term is anticipated to be 8.1% of the cost of the improvements to Mojave Drive at Mesa Linda Avenue.

[88] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

3.18 TRIBAL CULTURAL RESOURCES

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

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
- The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe ● Less than Significant Impact with Mitigation.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum). The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building.[89] A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

i. *Would the listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k),* ● *No Impact*

Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. The project site is not listed in the Register. *As a result, no impacts would occur.*

[89] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

ii. *Would the project have a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? ● Less than Significant Impact with Mitigation.*

A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a). *As a result, there will be a less than significant impact with mitigation.*

MITIGATION MEASURES

The following mitigation measures are required as a means to reduce potential tribal cultural resources impacts to levels that are less than significant:

TRI Mitigation #1. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Victorville that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

TRI Mitigation #2. The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

TRI Mitigation #3. Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

TRI Mitigation #4. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Victorville prior to building final.

3.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✖	
B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✖	
C. Would the project result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✖	
D. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✖	
E. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

- The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

- The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- The proposed project would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

- The proposed project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.

- The proposed project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? ● Less than Significant Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. The proposed office would be located along the north-facing elevation.[90]

There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently undeveloped and has existing electrical, sewer and water connections adjacent to the project site. The project site would connect to the existing 12 inch water pipelines located on Cactus Road and Mojave Drive. The project site would connect to the existing 8 inch sewer pipeline on Cactus Road and Diamond Road. The proposed project's connection can be adequately handled by the existing infrastructure. *As a result, the impacts will be less than significant.*

B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? ● Less than Significant Impact.*

In July of 2007, the former Victor Valley Water District (VVWD) and Baldy Mesa Water District (BMWD) were consolidated to form the District and became a subsidiary district to the City of Victorville, as ordered by Resolution No. 2977 of the Local Agency Formation Commission for the County of San Bernardino. The combined service areas of VVWD and BMWD form the District's current service area, which is approximately 85 square miles. The District owns and operates a potable water system that includes approximately 700 miles of pipeline, 34 active groundwater wells, four pump stations, 24 active storage reservoirs and 25 active pressure reducing valve stations (PRV) within an 85-square mile service area. The District's distribution system includes eight pressure zones and three sub-zones that provide water at suitable pressures across the range of elevations in the service area. The Southern California Logistics Airport (SCLA) area, at the former GAFB, is part of Zone 3170; however, this area is analyzed separately since most of the existing pipes' diameters and exact locations are unknown and the large industrial and commercial land uses generate unique demands. The District obtains local groundwater supplies from their own wells and from MWA. The District also has agreements and interconnections with neighboring agencies for emergency water if needed and available. The project site would connect to the existing 12 inch water pipelines located on Cactus Road and Mojave Drive.[91] The anticipated water demand for the proposed project is summarized in Table 3-10.

[90] Steeno Design Studio Inc. *Victorville Warehouse. Site Plan. Sheet A-0.*

[91] Personal communication with project architect.

TABLE 3-10 PROJECTED WATER CONSUMPTION

Project Element	Consumption Rate	Project Consumption
Warehouse (392,857 sq. ft)	0.045 gals./day/sq. ft.	17,679 gals./day
Total		17,679 gals./day

Source: Blodgett Baylosis Environmental Planning

The proposed project will be required to implement all pertinent water conservation measures. *As a result, the impacts will be less than significant.*

C. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ● Less than Significant Impact.*

The wastewater that is generated within the service boundary of VWD is collected through a gravity sewer system owned and operated by the City of Victorville. A portion of the collection system conveys wastewater to the Industrial Wastewater Treatment Plant (IWTP) that is owned and operated by VWD. A portion of the collection system discharges to a regional interceptor, which conveys the wastewater flows to a regional wastewater treatment plant (WWTP) owned and operated by the Victor Valley Wastewater Regional Authority (VVWRA).

In 2010, VWD began operation of the IWTP, a domestic and industrial wastewater treatment plant at the SCLA with a design capacity of 2.5 million gallons per day (MGD). The IWTP is designed to treat wastewater using both anaerobic (for high-strength industrial wastewater) and aerobic (for sanitary wastewater) treatment processes. The combined flows then undergo a complete-mix activated-sludge treatment and solids-separation process using membrane bioreactor (MBR) technology. The final process is ultraviolet disinfection, resulting in tertiary treated RW that meets Title 22 requirements. Sludge from the facility is currently discharged to VVWRA's WWTP for treatment and disposal. The portion of treated effluent from IWTP that is not reused at the SCLA is conveyed to the VVWRA WWTP site for disposal at Percolation Pond 14, which the VWD owns and operates. The project site would connect to the existing 8 inch sewer pipeline located in Cactus Road and Diamond Road.[92] Table 3-11 indicates the proposed projects anticipated effluent generation rate.

TABLE 3-11 PROJECTED EFFLUENT GENERATION

Project Element	Generation Rate	Project Generation
Warehouse (392,857 sq. ft)	0.025 gals./day/sq. ft.	9,821 gals./day
Total		9,821 gals./day

Source: Blodgett Baylosis Environmental Planning

The local infrastructure would have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments in conjunction with associated fees and existing plans, as applicable and as needed. *As a result, the impacts will be less than significant.*

[92] Personal communication with project architect.

D. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ● Less than Significant Impact.*

Table 3-12 indicates the proposed projects anticipated solid waste generation rate. The City of Victorville utilizes the Victorville Landfill for solid waste disposal. This landfill is operated by the Solid Waste Management Division of the San Bernardino County Public Works Department in accordance with a Waste Disposal Agreement between the City and the County. The Victorville landfill currently operates on 67-acres of a total 491-acre property with a capacity of 1,180 tons per day.

TABLE 3-12 PROJECTED SOLID WASTE GENERATION

Project Element	Generation Rate	Project Generation
Warehouse (392,857 sq. ft)	8.93 lbs./day/1,000 sq. ft.	3,508 lbs./day
Total		3,508 lbs./day

Source: Blodgett Baylosis Environmental Planning

With a planned expansion, as summarized in a Joint Technical Document prepared by the Solid Waste Management Division, the overall capacity will raise to 3,000 tons per day by expanding from a 67-acre operation to an approximately 341-acre operation. *The impacts will be less than significant.*

E. *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? ● No Impact.*

The proposed project, like all other development in Victorville and San Bernardino County, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				✖
B. Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✖
C. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✖
D. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✖

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on wildfire risk and hazards if it results in any of the following:

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

The proposed project would involve the construction and subsequent occupancy of a 392,857 square foot warehouse building within an 18.05-acre (786,742 square foot) vacant property. The project site is relatively level and is approximately 926 meters above sea level and contains no slope. The vegetation community present on site supports a disturbed desert scrub habitat that has been disturbed due human activity. The site encompasses some native plants, and some non-native grasses. The site is dominated by creosote bush (Larrea tridentata), white bursage (Ambrosia dumosa), Joshua tree (Yucca brevifolia), Common burrobrush (Ambrosia salsola) and cheatgrass (Bromus tectorum). The proposed new building would have a total floor area of 392,857 square feet that would include 14,933 square feet of office space and 377,924 square feet of warehouse floor area. The proposed project's floor area ratio (FAR) would be 0.49%. The total lot coverage would be 49.06%. Landscaping would total 60,663 square feet or 7.71% of the total site area and this landscaping would be provided around the site's perimeter and around the new building. A total of 70 dock-high doors would be provided along the building's south-facing elevation. The truck maneuvering areas would be located further south of the loading docks.

Surface streets will be improved by pavement at construction and will serve the project site and adjacent area. Currently, future Cantina Road, Cactus Road, and Mesa Linda Avenue are unimproved roads. The project's proposed circulation and access plan includes extending and constructing the southern half of Cactus Road from end of its improved section (about 360 feet east of Highway 395) to Mesa Linda Avenue; constructing the western half of Mesa Linda Avenue from Cactus Road to the southern edge of the property; and constructing the eastern half of Cantina Road from Cactus Road to the southern edge of the property. All construction staging must occur on-site. *As a result, no impacts will occur.*

B. *Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ● No Impact.*

The project site is not located within any fire hazard severity zones. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles northeast and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. *As a result, no impacts will occur.*

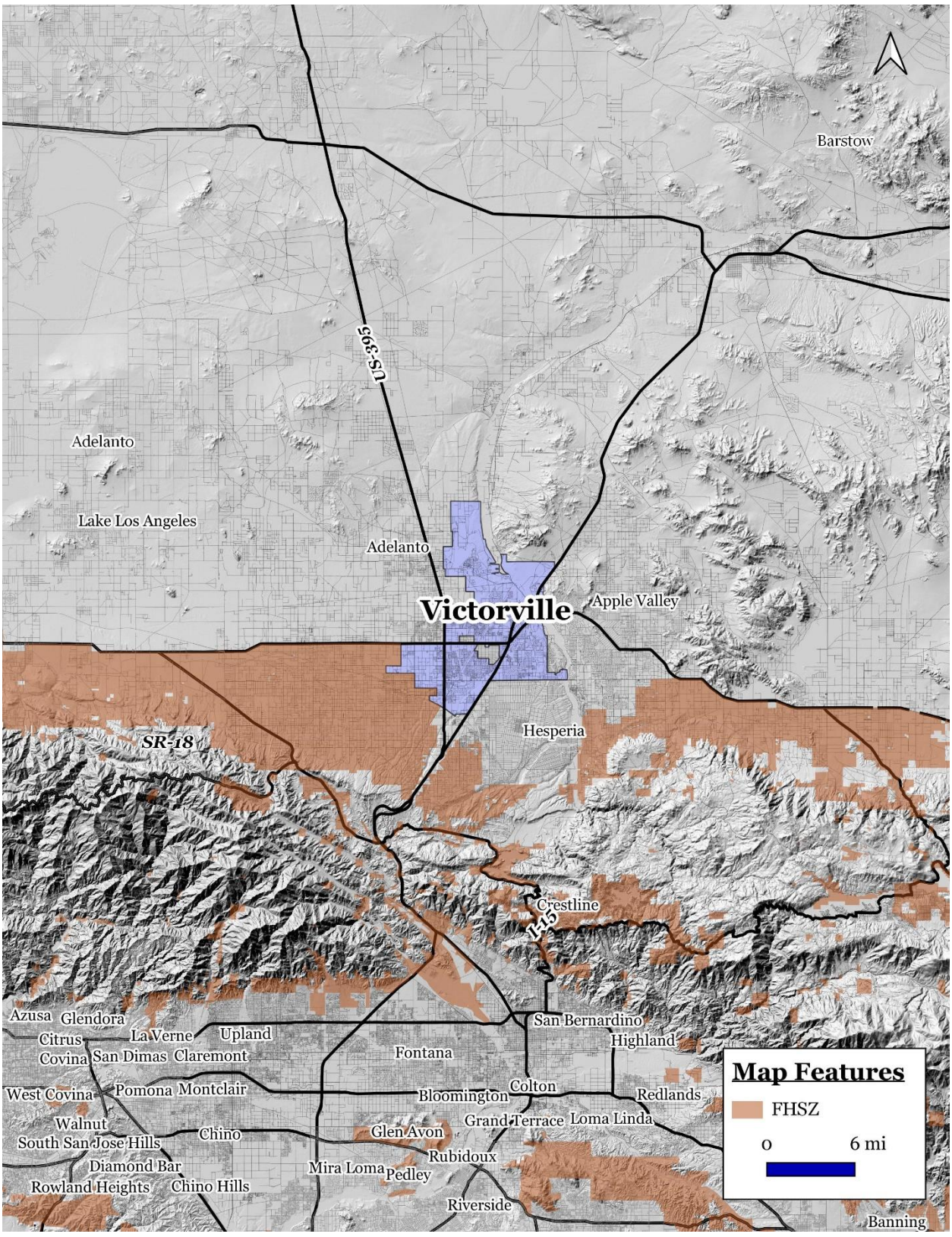

EXHIBIT 3-8 FHSZ MAP

SOURCE: CALFIRE

C. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ● No Impact.*

The project site is not located in an area that is classified as a moderate fire risk severity within a Local Responsibility Area (LRA), and therefore will not require the installation of specialized infrastructure such as fire roads, fuel breaks, or emergency water sources. *As a result, no impacts will occur.*

D. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ● No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. The proposed project site is not located within an area classified as very high fire hazard severity zones and is not within a flood zone. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes. *As a result, no impacts will occur.*

MITIGATION MEASURES

The analysis of wildfire impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				✖
B. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✖
C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✖

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

A. The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

B. The proposed project *will not* have impacts that are individually limited, but cumulatively considerable. The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.

C. The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.

SECTION 4. CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Victorville can make the following additional findings: a mitigation monitoring and reporting program would be required.

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SECTION 5. REFERENCES

5.1 PREPARERS

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5.2 REFERENCES

The references that were consulted have been identified using footnotes.

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