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Prepared for:



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Department of Development
14343 Civic Drive
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April 2024

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Initial Study / Mitigated Negative Declaration of the Fort Amethyst Self Storage Project, Victorville, CA

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Table of Contents

1.0	INTRODUCTION	1
1.1	Project Information.....	1
1.2	Purpose of the Initial Study.....	1
2.0	PROJECT DESCRIPTION	3
2.1	Project Features	3
2.2	Project Location and Site Plan.....	3
2.3	Existing General Plan Land Uses and Zoning Designations.....	3
2.4	Surrounding Land Uses in the Project Vicinity	5
2.5	Construction.....	5
2.6	Required Permits and Approvals.....	5
3.0	ENVIRONMENTAL CHECKLIST.....	7
3.1	Environmental Factors Potentially Affected	7
3.2	Determination	8
3.3	Environmental Checklist and Discussion.....	9
3.3.1	<i>Aesthetics</i>	10
3.3.2	<i>Agriculture and Forestry Resources</i>	12
3.3.3	<i>Air Quality</i>	14
3.3.4	<i>Biological Resources</i>	19
3.3.5	<i>Cultural Resources</i>	22
3.3.6	<i>Energy</i>	25
3.3.7	<i>Geology and Soils</i>	26
3.3.8	<i>Greenhouse Gas Emissions</i>	31
3.3.9	<i>Hazards and Hazardous Materials</i>	36
3.3.10	<i>Hydrology and Water Quality</i>	39
3.3.11	<i>Land Use and Planning</i>	45
3.3.12	<i>Mineral Resources</i>	46
3.3.13	<i>Noise</i>	47
3.3.14	<i>Population and Housing</i>	51
3.3.15	<i>Public Services</i>	52
3.3.16	<i>Recreation</i>	54
3.3.17	<i>Transportation</i>	55
3.3.18	<i>Tribal Cultural Resources</i>	57
3.3.19	<i>Utilities and Service Systems</i>	59
3.3.20	<i>Wildfires</i>	61
3.3.21	<i>Mandatory Findings of Significance</i>	64
4.0	REFERENCES.....	66

Table of Appendices

APPENDIX A – AIR QUALITY AND GREENHOUSE GAS EMISSIONS STUDY	
APPENDIX B – BIOLOGICAL RESOURCES ASSESSMENT	
APPENDIX C – CULTURAL RESOURCE ASSESSMENT AND AB 52 CONSULTATION	
APPENDIX D – GEOTECHNICAL AND SOILS REPORTS	
APPENDIX D.1 PRELIMINARY GEOTECHNICAL INTERPRETIVE REPORT	
APPENDIX D.2 FEASIBILITY REPORT FOR SEEPAGE PIT DESIGN	
APPENDIX E – PALEONTOLOGICAL RESOURCES ASSESSMENT	
APPENDIX F – PHASE I ENVIRONMENTAL SITE ASSESSMENT	
APPENDIX G – PRELIMINARY DRAINAGE REPORT AND WATER QUALITY MANAGEMENT PLAN	
APPENDIX H – NOISE IMPACT STUDY	
APPENDIX I – TRIP GENERATION AND VMT SCREENING ANALYSIS	

List of Figures

Figure 2-1: Project Vicinity	3
Figure 2-2: Proposed Site Plan	4

List of Tables

Table 1-1: Project Information and Contact Information	1
Table 3-1: Construction Emissions Summary and Significance Evaluation	16
Table 3-2: Operational Emissions Summary and Significance Evaluation	17
Table 3-3: Greenhouse Gas Emissions Summary and Significance Evaluation.....	34
Table 3-4: City of Victorville Base Ambient Noise Levels.....	48
Table 3-5: Estimated Peak Activity Daytime Noise Impacts - Residential Receptors	49

List of Acronyms and Abbreviations

AB	Assembly Bill
APN	Assessor's Parcel Number
bgs	Below Ground Surface
BMP	Best Management Practice
CA	California
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model [®]
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CBMI	Cabazon Band of Mission Indians
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH ₄	Methane
CHRIS	California Historical Resources Information System
City	City of Victorville, CA
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
COA	Conditions of Approval
County	San Bernardino County
CRMP	Cultural Resource Management Plan
dB	Decibel
dBA	A-Weighted Decibel
DRP	Development Review Process
DTSC	[California] Department of Toxic Substances Control
EIR	Environmental Impact Report
ESA	Environmentally Sensitive Area

FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GHGRP	Greenhouse Gas Reduction Plan
GWP	Global Warming Potential
H ₂ S	Hydrogen Sulfide
HNL	Hourly Noise Level
HVAC	Heating, Ventilation, and Air Conditioning
IS	Initial Study
ITE	Institute of Transportation Engineers
lbs	pounds
L _{dn}	Day-Night Average Noise Level
L _{eq}	Equivalent Continuous Noise Level
L _{max}	Maximum L _{eq}
L _{min}	Minimum L _{eq}
LRA	Local Responsibility Area
MBMI	Morongo Band of Mission Indians
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
MLD	Most Likely Descendant
MND	Mitigated Negative Declaration
MS4	Municipal Separate Storm Sewer System
MT	Metric Ton
MTY	Metric Ton per Year
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO ₂	Nitrogen Dioxide
NO _x	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	Ozone
Pb	Lead
PM ₁₀	Respirable Particulate Matter
PM _{2.5}	Fine Particulate Matter
PPV	Peak Particle Velocity
PRC	[California] Public Resources Code
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
R	Refrigerants

RCP	Reinforced Concrete Pipe
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCOG	San Bernardino Council of Governments
SBCTA	San Bernardino County Transportation Authority
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SLF	Sacred Lands File
SO ₂	Sulfur Dioxide
SOI	[United States] Secretary of the Interior
SO _x	Oxides of Sulfur
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TBMI	Twenty-Nine Palms Band of Mission Indians (TBMI)
TCR	Tribal Cultural Resource
THPO	Tribal Historic Preservation Officer
TPA	Transit Priority Area
U.S. DOT	United States Department of Transportation
U.S. EPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WQMP	Water Quality Management Plan
YSMN	Yuhaaviatam of San Manuel Nation

Initial Study/Mitigated Negative Declaration of the Fort Amethyst Storage Project

1.0 INTRODUCTION

1.1 Project Information

Westgate Plaza LLC (applicant) is proposing to develop a self-storage facility to be located east of Amethyst Road and south of Palmdale Road in the City of Victorville, CA. Information regarding the proposed Project is summarized in Table 1-1.

Table 1-1: Project Information and Contact Information

1.	Project Title	Fort Amethyst Storage Project (PS 0621-00214)
2.	Lead Agency Name and Address	City of Victorville Department of Development, Planning Division 14343 Civic Drive, PO Box 5001 Victorville, CA 92393
3.	Contact Person and Phone Number	Mr. Travis Clark Senior Planner City of Victorville Planning Division (760) 955-5135
4.	Project Location	East of Amethyst Road and south of Palmdale Road (APN 3105-291-01)
5.	Project Sponsor and Contact Information	Westgate Plaza LLC Mr. Chad McKillop 1006 Straightaway Court Oceanside, CA 92057 (619) 395-0907 Chad@hillsideequitygroup.com
6.	General Plan Designation(s)	Commercial
7.	Zoning Designation	C-1 (Neighborhood Service District)

1.2 Purpose of the Initial Study

This Initial Study (IS)/Mitigated Negative Declaration (MND) has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA), as set forth in the California Public Resources Code (PRC) Sections 21000 to 21174. In accordance with the California Code of Regulations (CCR) Title 14 Section 15002(a) CEQA Guidelines, the basic purposes of CEQA are to inform public agency decisionmakers and the general public of the significant environmental effects of a Project, identify possible ways to minimize the significant

effects through the use of mitigation measures or alternatives to the Project, and disclose to the public the reasons why a government agency could approve the Project if significant environmental effects are involved.

An IS for a Project subject to CEQA is prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Project (CEQA Guidelines Section 15063). This IS informs the City of Victorville (City) decisionmakers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the proposed Project, as defined in Section 15382. As such, this document's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service, and infrastructure requirements and other local and regional environmental considerations (PRC Section 21003.1);
- Encourage the applicant to incorporate environmental considerations into Project conceptualization, design, and planning at the earliest feasible time [State CEQA Guidelines Section 15004(b)(3)]; and
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the County and the applicant to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted (State CEQA Guidelines Section 15126.4).

The public, including City residents and other local and State resource agencies, will be given the opportunity to review and comment on the CEQA Draft IS/MND document during a 30-day public review period. Comments received during the review period will be considered prior to adoption of the IS/MND and Project approval.

2.0 PROJECT DESCRIPTION

2.1 Project Features

The proposed Fort Amethyst Storage Project (Project) is a development of a self-storage facility on a 6.84-acre triangular site in Victorville, CA. The Fort Amethyst Storage facility will include 24 structures offering an industry standard range of storage unit sizes. The proposed total building area will be 121,899 square feet, which will consist of a 1,254 square-foot office and on-site manager's apartment building and 120,645 square feet of self-storage buildings. Seven parking spaces will be provided on the site.

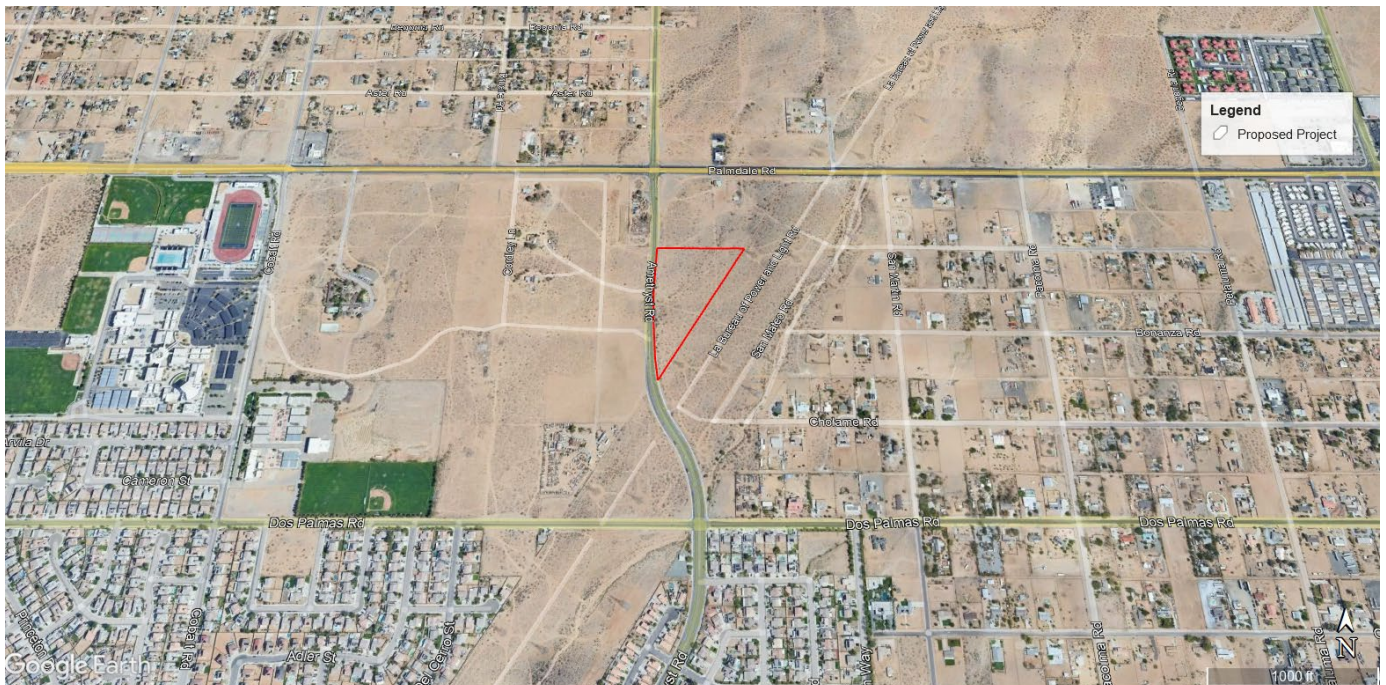
2.2 Project Location and Site Plan

The Project is proposed to be developed immediately east of Amethyst Road and approximately 635 feet (0.12 miles) south of Palmdale Road in Victorville, CA. The Assessor's Parcel Number (APN) is 3105-291-01-0000. Figure 2-1 provides an overview of the Project vicinity. Figure 2-2 shows the proposed site plan.

2.3 Existing General Plan Land Uses and Zoning Designations

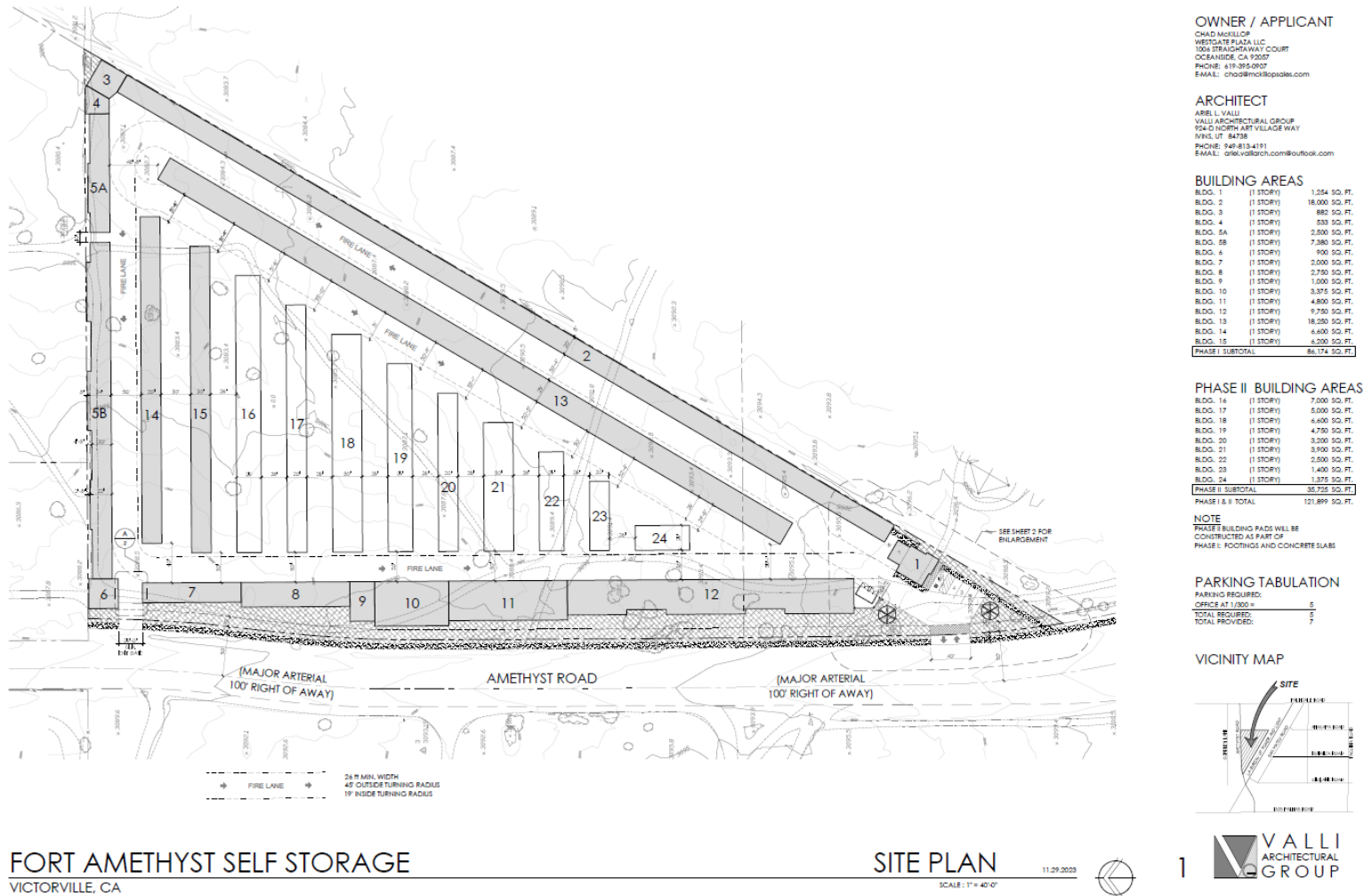
The subject property is currently zoned C-1 (Neighborhood Service District). The C-1 zoning district is intended to be for small, limited shopping centers and services designed to meet more localized neighborhood needs. The neighborhood service district is consistent with the commercial land use designation of the General Plan. Thus, the proposed Project is consistent with the current zoning.

Figure 2-1: Project Vicinity



Initial Study/Mitigated Negative Declaration of the Fort Amethyst Self-Storage Project Westgate Plaza LLC

Figure 2-2: Proposed Site Plan



2.4 Surrounding Land Uses in the Project Vicinity

As shown on Figure 2-1, the properties surrounding the proposed Project site are largely undeveloped land. There is a residence with an automobile salvage yard on the western side of Amethyst Road at the northwest corner of the Project Site. The Oficina Night Club is north of the site on the south side of Palmdale Road and the Symmetry Physical Therapy & Wellness Center is across on the north side of Palmdale Road. The slanted eastern side and southern tip of the Project site are along a right-of-way corridor on either side of LA Bureau of Power and Light Road, with residential areas further to the east.

2.5 Construction

Construction is proposed to take place in two phases, with Phase I consisting of the office and apartment building along with 14 storage buildings and Phase II consisting of the remaining nine storage buildings. Since the construction site is already vacant and generally flat, site preparation and grading activities are expected to be relatively minimal. No demolition of existing structures is required. The Project is expected to take approximately 14 months to construct, with construction beginning upon Project approval.

2.6 Required Permits and Approvals

The issuance of grading and building permits and completion of structures to current building code is required by the City prior to establishment of any development on-site.

Adherence to regulations of and/or approval from the following agencies and utilities may be required:

- Mojave Water Agency;
- Lahontan Regional Water Quality Control Board;
- California Department of Fish and Wildlife;
- Mojave Desert Air Quality Management District;
- Southern California Edison; and
- Southwest Gas.

This Project also requires consultation related to tribal cultural resources as follows:

- Approved in 2014, Assembly Bill (AB) 52 establishes a formal consultation process for California Native American tribes to identify potential significant impacts to tribal cultural resources (TCRs), as defined in Public Resources Code (PRC) Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In compliance with AB 52, a notice was provided to tribes that a CEQA Initial Study was being prepared and solicited requests for consultation. In addition, a cultural resources study was performed which included database searches from the South Central Coastal Information Center (SCCIC) at California State University at Fullerton and the Native

American Heritage Commission (NAHC), and a field survey of the Project site. The results of this study are discussed in Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.

3.0 ENVIRONMENTAL CHECKLIST

The CEQA Guidelines provide an environmental checklist in Appendix G that forms a standard evaluation tool to identify a Project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed Project. For this proposed Project, no topical areas on the checklist were found to have mitigated impacts exceeding applicable thresholds of significance.

3.1 Environmental Factors Potentially Affected

The following environmental resource areas have been assessed to determine their potential to be adversely affected by the proposed Project. As indicated by the checklists on the following pages, environmental topics marked with a "✓" could be adversely affected by the proposed Project, thus necessitating mitigation measures. An explanation relative to the determination of impacts can be found following the checklist questions for each resource area.

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

3.2 Determination

On the basis of this initial evaluation (check one):

- ☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that 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.
- ☐ I find that 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: _____

Date: _____

Printed Name: _____

Title: _____

3.3 Environmental Checklist and Discussion

This section provides a discussion of the potential environmental impacts of the proposed Project. The evaluation of environmental impacts follows the questions provided in the Appendix G Checklist of the CEQA Guidelines.

For each question listed in the Appendix G checklist, a determination of the level of significance of the impact is provided. Impacts are assigned to one of the following categories:

- A designation of no impact is given when no adverse changes in the environment are expected;
- A less than significant impact would cause no substantial adverse change in the environment;
- A less than significant impact with mitigation incorporated would have a substantial adverse impact on the environment but could be reduced to a less than significant level with incorporation of mitigation measure(s); and
- A potentially significant impact would cause a substantial adverse effect on the environment and no feasible mitigation measures would be available to reduce the impact to a less than significant level.

A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency relied upon for the scoping analysis. A No Impact answer is adequately supported if the referenced information sources show that the impact simply does not apply to the Project (e.g., the Project falls outside a fault rupture zone). A No Impact answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

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

Once it is determined that a particular physical impact may occur, then the checklist answers must indicate if the impact is potentially significant, less than significant with mitigation, or less than significant.

“Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more Potentially Significant Impact entries when the determination is made, an Environmental Impact Report (EIR) is required.

“Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from Potentially Significant Impact to a Less Than Significant Impact. Mitigation measures are identified and explain how they reduce the effect to a less than significant level.

Explanation of each issue identifies:

- The significance criteria or threshold, if any, used to evaluate each question; and
- The mitigation measure identified, if any, to reduce the impact to less than significant.

3.3.1 Aesthetics

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

Environmental Setting:

The City's General Plan Resource Element recognizes the protection of local scenic resources as necessary for maintaining the overall livability and aesthetic qualities of the City.

The City of Victorville is characterized by a relatively flat topography and is in a geographic subregion of the southwestern Mojave Desert known as the Victor Valley. The Victor Valley is separated from other urbanized areas in Southern California by the San Bernardino and San Gabriel mountains. The developed/urbanized area of the city is generally flat or moderately sloping desert terrain characterized by a gradual incline from the Mojave River toward the San Bernardino Mountains to the south and from the Mojave River to the mountains in and surrounding the northern part of the city, including Quartzite Mountain. Areas of high visual sensitivity within and adjacent to the city include the Transverse Range, the Mojave River, the rocky bluffs of the lower Mojave River narrows, and Mojave Narrows Regional Park.

Environmental Determination:

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

Less than Significant Impact. The Project site is not near a State scenic highway, and there are no identifiable scenic vistas in the immediate area. There are no identifiable scenic resources within the Project site, such as historic buildings or rock outcroppings. Additionally, existing General Plan and Land Use allowances permit development of this type on the property, and all development will require conformance with the applicable development standards of the Victorville Municipal Code. Therefore, the Project would result in a less than significant impact.

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

No Impact. The City of Victorville's General Plan Resource Element recognizes the protection of local scenic resources as necessary for maintaining the overall livability and aesthetic qualities of the City. However, there are not any identifiable scenic resources within the Project site and immediate area. Additionally, no identified historic buildings exist within the Project area.

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

Less than Significant Impact. The Project would involve the development of a conventional self-storage facility in an area zoned for commercial uses. The City's General Plan and Development Code assumes and permits this type of development and provides development standards such as height restrictions and other design guidelines which are intended to reduce any potential degradation to visual character and quality of public views. The Project would not substantially degrade existing visual character or degrade any existing public views that are publicly accessible from a vantage point. Therefore, the Project would result in a less than significant impact.

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

Less than Significant Impact. The Project would provide new sources of light including parking lot lighting and lighting used for office and for use in the storage facility for safety and security purposes. There could be a potential increase of light and/or glare from the proposed lighting fixtures, albeit very minor due to the location of the Project and the surrounding land uses. The City's General Plan and Development Code assumes and permits this type of development, and provides development standards such as energy consumption limits, downward facing lighting fixtures, and other design features and guidelines intended to reduce any potential light and glare. Therefore, the Project would result in a less than significant impact.

Mitigation Measures:

None required.

3.3.2 Agriculture and Forestry Resources

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

Environmental Determination:

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

No Impact. The Project site has not been used for agriculture and is not listed as Prime Farmland, Unique Farmland or Farmland of Statewide Importance (California Department of Conservation, 2016). No farmland is located within the vicinity that may be affected by the development of the Project. Therefore, there would be no impact on agricultural resources.

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

No Impact. The Project site has not been used for agriculture and is not under a Williamson Act contract. No farmland is located within the vicinity that may be affected by the development of the Project. Therefore, there would be no impact on agricultural resources.

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

No Impact. The Project is zoned for commercial development, which does not conflict with the proposed development. No forest land or farmland is located within the vicinity that may be affected by the development of the Project. Therefore, there would be no impact on forest resources.

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

No Impact. The Project site is not currently forest land and no forest land is located within the vicinity that may be affected by the development of the Project. Therefore, there would be no impact on forest resources.

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

No Impact. The Project has not been used for agriculture or forest land, and there is no farmland or forest land located within the vicinity that may be affected by the development of the Project. Therefore, the Project would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

Mitigation Measures:

None required.

3.3.3 Air Quality

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Setting:

The Project site is in San Bernardino County within the Mojave Desert Air Basin (MDAB). The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains which dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in southern California by differential heating are channeled through the MDAB. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet), whose passes form the main channels for these air masses. The Antelope Valley is bordered in the northwest by the Tehachapi Mountains, separated from the Sierra Nevada in the north by the Tehachapi Pass (3,800 feet elevation). The Antelope Valley is bordered in the south by the San Gabriel Mountains, bisected by Soledad Canyon (3,300 feet). The MDAB is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 feet). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley). The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the

Coachella Valley) whose primary channel is the San Geronio Pass (2,300 feet) between the San Bernardino and San Jacinto Mountains.

The United States Environmental Protection Agency (U.S. EPA), under the federal Clean Air Act (CAA), has determined maximum ambient concentrations that should be allowed for the protection of public health for seven “criteria” air pollutants. These maximum concentrations are known as the National Ambient Air Quality Standards (NAAQS). The seven criteria air pollutants are ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead (Pb).

The California Air Resources Board (CARB), under the California CAA, establishes maximum concentrations for the seven federal criteria air pollutants, as well as four additional air pollutants: visibility-reducing particles, sulfates, hydrogen sulfide (H₂S), and vinyl chloride. These maximum concentrations are known as the California Ambient Air Quality Standards (CAAQS). For areas within the State that have not attained air quality standards, CARB works with local air districts to develop and implement attainment plans to obtain compliance with both federal and State air quality standards. The local air district with jurisdiction over the Project site is the Mojave Desert Air Quality Management District (MDAQMD).

Environmental Determination:

Estimated construction and operational impacts are evaluated against quantitative criteria established by the MDAQMD. These criteria are relied upon to make significance determinations based on mass emissions of criteria pollutants. As shown in Tables 4-1 and 4-2 below, the proposed Project would result in a less than significant impact related to regional emissions. Further, the proposed Project would not conflict with MDAQMD planning goals, cause substantial air pollutant concentrations, or be a source of objectionable odors. Appendix A contains the Yorke Engineering, LLC (Yorke) technical report dated November 28, 2023, with details of the air quality and greenhouse gas (GHG) emissions study conducted.

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

Less Than Significant Impact. The applicable air quality plan for the Project is the 2023 Ozone Attainment Plan (2023 Plan).¹ The purpose of the 2023 Plan is to address the attainment and maintenance of State and federal ambient air quality standards for ozone in the MDAB. The portion of the MDAB that includes the Project site is designated as non-attainment for ozone NAAQS and CAAQS and PM₁₀ CAAQS. The MDAQMD has adopted or is in the process of adopting the control measures recommended in the 2023 Plan in its Rules and Regulations. The MDAQMD has also adopted fugitive dust control requirements in its Rule 403, *Fugitive Dust Control*, which will be part of the Project design. Because the Project would comply with the MDAQMD’s Rules and Regulations, including those adopted from the 2023 Plan, the Project would not conflict with or obstruct

¹ MDAQMD Federal 70 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area), January 2023, <https://www.mdaqmd.ca.gov/home/showpublisheddocument/9693/638131029372006663>.

implementation of the applicable Air Quality Plan. Therefore, the Project would have a less than significant impact with respect to this criterion.

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. Intermittent (short-term construction emissions that occur from activities, such as site grading, paving, and building construction) and long-term air quality impacts related to the operation of the Project were evaluated. The analysis focuses on daily and annual emissions from construction and operational (mobile, area, and fugitive source) activities.

A significant impact would occur if the proposed Project would violate any air quality standard or contribute substantially to an existing or Projected air quality violation. Project construction and operation emissions are estimated using the California Emissions Estimator Model[®] (CalEEMod), the statewide land use emissions computer model designed to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from land use projects.

See Appendix A which contains additional details on the air quality and GHG emissions study conducted.

Construction

Construction of the Project would occur over approximately 14 months. Construction activities would consist of site preparation, grading, building construction, paving, and architectural coating. Earthwork would be balanced on-site. Table 3-1 provides the estimated maximum daily construction emissions that would be associated with the Project and compares those emissions to the MDAQMD's significance thresholds for construction exhaust emissions. All construction-related emissions would be below the MDAQMD significance thresholds.

Table 1-2: Construction Emissions Summary and Significance Evaluation

Criteria Pollutants	Maximum Emissions		Threshold		Significant?
	Daily (lbs/day)	Annual (tons/yr)	Daily (lbs/day)	Annual (tons/yr)	
ROG (VOC)	29.3	0.34	137	25	NO
NO _x	36.1	1.80	137	25	NO
CO	34.0	2.66	548	100	NO
SO _x	0.05	0.00	137	25	NO
Total PM ₁₀	6.9	0.32	82	15	NO
Total PM _{2.5}	4.2	0.14	65	12	NO

Sources: MDAQMD 2020, CalEEMod version 2022.1.1.20

Notes:

CalEEMod outputs organic emissions as reactive organic gases (ROG) but the significance thresholds are listed as volatile organic compounds (VOC), which is assumed to be equivalent for this report.

lbs/day are winter or summer maxima for planned land use.

Total PM₁₀ / PM_{2.5} comprises fugitive dust plus engine exhaust.

The Project would be required to comply with the fugitive dust control requirements for construction projects in MDAQMD Rule 403; therefore, impacts would be less than significant.

Operations

CalEEMod was used to estimate emissions that would be associated with motor vehicle use, landscape maintenance, and other minor area sources (paints, solvents, etc.) expected to occur once the Project is operational. Emissions estimates assume an operational year of 2025 (the first full year the Project could conceivably operate), and emissions would decrease on annual basis in subsequent years of operation due to the phase-out of higher polluting vehicles and the implementation of more stringent emission standards.

Estimated daily operational emissions that would be associated with the Project are presented in Table 3-2 and are compared to the MDAQMD's thresholds of significance. As indicated in Table 3-2, the estimated operational emissions would be below the MDAQMD's significance thresholds and would be less than significant.

Table 3-4: Operational Emissions Summary and Significance Evaluation

Criteria Pollutants	Maximum Emissions		Threshold		Significant?
	Daily (lbs/day)	Annual (tons/yr)	Daily (lbs/day)	Annual (tons/yr)	
ROG (VOC)	7.1	0.9	137	25	NO
NO _x	2.1	0.4	137	25	NO
CO	19.8	2.1	548	100	NO
SO _x	0.0	0.0	137	25	NO
Total PM ₁₀	1.2	0.2	82	15	NO
Total PM _{2.5}	0.58	0.1	65	12	NO

Sources: MDAQMD 2020, CalEEMod version 2022.1.1.20

Notes:

CalEEMod outputs organic emissions as ROG but the significance thresholds are listed as VOC, which is assumed to be equivalent for this report.

lbs/day are winter or summer maxima for planned land use.

Total PM₁₀ / PM_{2.5} comprises fugitive dust plus engine exhaust.

Conclusions

As indicated in Tables 3-1 and 3-2, construction and operational emissions from the Project would be below the applicable significance thresholds. Compliance with the applicable fugitive dust rules would ensure fugitive dust is controlled and less than significant. Because the Project's emissions are less than significance thresholds, the emissions during construction and operations would not be expected to result in a cumulatively considerable impact to air quality. Therefore, the Project would have a less than significant impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The MDAQMD *CEQA and Federal Conformity Guidelines* (MDAQMD 2020) define sensitive receptor land uses as residences, schools, daycare centers, playgrounds, and medical facilities. The following proposed Project types

for sites within the specified distance of existing or planned sensitive receptor land uses must be evaluated using the MDAQMD's health risk significance thresholds:

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

Project operations would not consist of industrial stationary sources or generate heavy truck trips. Operations would consist of buildings for self-storage and parking. The nearest sensitive (residential) receptor is approximately 240 feet to the northwest of the Project site. Construction and operation of the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the Project would have a less than significant impact.

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project site. The proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Construction of the proposed Project would not cause an odor nuisance. The Project would consist of buildings for self-storage and parking and would not include activities known to generate odors.

Examples of land uses and industrial operations that have the potential to generate considerable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would consist of buildings for self-storage and parking and would not include activities known to generate odors. Therefore, the proposed Project would result in a less than significant impact related to objectionable odors, and no mitigation is required.

Mitigation Measures:

None required.

3.3.4 Biological Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources. Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Environmental Setting:

A biological resources assessment (Biological Assessment) was performed by SWCA Environmental Consultants (SWCA) in June 2023 (Appendix B). Per the Biological Assessment, the California Natural Diversity Database (CNDDB) RareFind 6 and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants revealed nine special status plants and 28 special status wildlife species in the nine quad search area. No plant or wildlife species were considered to have more than a low potential to occur on the Project site. This expectation is due to lack of suitable habitat and the disturbed condition of the Project site.

Environmental Determination:

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

No Impact. No special status species were identified during the 1-day field survey, nor are they expected to occur based on lack of habitat and disturbed conditions on-site.

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

No Impact. No riparian habitat or other sensitive natural communities were found on or adjacent to the proposed Project site during the field survey or have been reported in the literature. Therefore, there would be no impact.

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

No Impact. No wetlands were found on or adjacent to the proposed Project site during the field survey or have been reported in the literature. Therefore, there would be no impact.

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

Less Than Significant with Mitigation Incorporated. Potentially suitable nesting bird habitat is present on-site and within 300 feet of the project site. Nesting birds are protected by the California Fish and Game Code and by the Migratory Bird Treaty Act, which prohibit take of all birds and their active nests including raptors and other migratory nongame birds. The nesting season is generally defined as 1 January to 15 September. Construction conducted during this period could result in adverse impacts to nesting birds. This potential impact would be reduced to less than significant levels with pre-construction surveys to identify and avoid active nests. Refer to MM BIO-1.

The project area is not within an established migratory wildlife corridor habitat linkage (Penrod, et al. 2012) and does not contain suitable habitat for migratory fish or wildlife movement. It is not connected to regional natural open space areas. No impact would result to such resources from Project implementation.

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

No Impact. There are no biological resources, including no Joshua Trees, present on the Project area that are protected by local policies and/or ordinances, and no impact would occur.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The Project is within the Western Mojave Plan area but does not contain protected resources as defined in that Plan. Therefore, the Project would not conflict with the provisions of the Plan.

Mitigation Measures:

Mitigation Measure BIO-1: If construction (including ground-disturbing activities and vegetation trimming and/or removal) would occur during the nesting bird season (1 January to 15 September), a qualified biologist shall conduct preconstruction nesting bird surveys within 30 days of construction start-up and continuing weekly up to three days before startup. The survey area shall include the Project area (disturbance footprint) and a surrounding 300-foot buffer area. Active bird nests shall be protected by installation of temporary physical barriers that define a buffer area of 100 feet surrounding each nest. Buffer size may be reduced or increased based on the bird species present and on the advice of the qualified biologist (e.g., smaller buffer for songbirds, larger buffer for raptors). In no case shall buffers be less than 50 feet. No construction work, equipment, or personnel shall enter the buffer area. Protective buffers shall remain in place until the biologist determines that the nest(s) are no longer active, and the chicks have permanently fledged (left the nest) and a second nesting attempt has not begun.

3.3.5 Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Environmental Setting:

The cultural resources assessment report prepared by SWCA, dated June 2023, documents the methods and results of the cultural resource assessment to identify historical resources within the Project area. The investigations included a confidential records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), archival research, and an intensive pedestrian survey. Efforts were also made to assess the likelihood of encountering buried cultural resources within the Project area and inform the analysis of potential impacts in accordance with Appendix G of the CEQA Guidelines.

The CHRIS records search identified eight previously recorded cultural resources within a 1.6-kilometer (1.0-mile) radius of the Project area. None of the cultural resources were within the Project area. Seven of the eight cultural resources identified were historic in age. The single prehistoric resource consisted of a lithic scatter (P-36-012839). The SLF search was positive for tribal cultural resources (TCRs) or potential TCRs, and the NAHC requested that the Chemehuevi Indian and other tribes be contacted.

Results of an intensive pedestrian survey were negative for archaeological or historic resources. Based on these observations, the Project area has low to moderate sensitivity for prehistoric and historic resources. Hence, it is recommended that the Project area be resurveyed during vegetation removal and grubbing to identify any archaeological materials on the surface of the site that may not have been visible during the survey. Development of a Monitoring Plan and monitoring may be required should any evidence of archaeological deposits be found. A copy of the cultural resources assessment report, including responses from two tribes, is included in Appendix C.

As part of the City's notification process required by AB 52, the City notified four Tribal Governments, Yuhaaviatam of San Manuel Nation (YSMN, formerly known as the San

Manuel Band of Mission Indians), Cabazon Band of Mission Indians (CBMI), Morongo Band of Mission Indians (MBMI), Twenty-Nine Palms Band of Mission Indians (TBMI). The City sought the input of all the tribal governments at the onset of AB 52 and the four Tribes notified are the only ones that requested to be notified of projects within the City of Victorville.

Upon notification regarding the proposed Project, two replies were received, one each from MBMI and YSMN, both of which suggested Mitigation Measures for both cultural resources and TCRs. The Mitigation Measures suggested by both tribes have formed the basis for the measures included in this IS/MND. A copy of the Tribes' correspondence with the City is included in Appendix C.

Environmental Determination:

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

Less Than Significant with Mitigation Incorporated. The CHRIS records search identified eight previously recorded cultural resources within a 1.6-kilometer (1.0-mile) radius of the Project area. None of the cultural resources identified in this database were within the Project area. Seven of the eight cultural resources identified were historic in age. The single prehistoric resource consisted of a lithic scatter (P-36-012839). The cultural resources assessment report provided in Appendix C states that the Project area has low to moderate sensitivity for prehistoric and historic resources. Although cultural resources were not found on-site during the pedestrian survey or in the database searches, there is a potential that buried resources could be found during ground disturbance activities. Mitigation Measures CUL-1 through CUL-6 and TCR-1 and TCR-2 would reduce potentially significant impacts on archaeological and historical resources to less than significant.

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

Less Than Significant with Mitigation Incorporated. The probability of historical or archeological resources is low. However, there always exists a potential to encounter previously unreported subsurface historical and archaeological resources during future construction activities. Measures CUL-1 through CUL-6 and TCR-1 and TCR-2 would reduce potentially significant impacts on archaeological and historical resources to less than significant.

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

Less Than Significant with Mitigation Incorporated. The discovery of human remains is always a possibility during ground disturbances. Mitigation Measure CUL-6 would reduce potentially significant impacts to less than significant.

Mitigation Measures:

Mitigation Measure CUL-1: Retention of Archaeologist. Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement, construction excavation, excavation for utility and

irrigation lines, and landscaping), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). Development of a Monitoring Plan may be required should any evidence of archaeological deposits be found.

Mitigation Measure CUL-2: Worker Environmental Awareness Training. Prior to any ground disturbance, the archaeologist will conduct Cultural Resource Sensitivity Training, in conjunction with the appropriate Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.

Mitigation Measure CUL-3: Cultural Resources Management Plan. Prior to any ground-disturbing activities, the Project archaeologist shall develop a Cultural Resource Management Plan (CRMP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the Project site. This Plan shall be written in consultation with the consulting Tribe(s) and shall include the following: approved Mitigation Measures and procedures to be followed, contact information for all pertinent parties, parties' responsibilities, and an overview of the Project schedule.

Mitigation Measure CUL-4: On-site Monitoring. The Project area will be re-surveyed by a qualified archeologist during vegetation removal and grubbing to identify any archaeological materials on the surface of the site that may not have been visible during the initial survey. During all ground-disturbing activities, the qualified archaeologist shall be on-site full-time as well as the Native American monitor, if available. Archaeological and TCR monitoring can be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

Mitigation Measure CUL-5: Inadvertent Discovery of Cultural Resources. In the event that cultural resources are exposed during construction, work in the immediate vicinity of the find (within a 60-foot buffer) must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. The tribal monitor or representative shall be contacted regarding any pre-contact and/or historic-era cultural resources discovered during Project construction and shall be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to Tribal representatives for review and comment.

Mitigation Measure CUL-6: Inadvertent Discovery of Human Remains. If human remains or funerary objects are encountered during any ground disturbing activities, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5. The area around the find shall be protected and personnel/observers will be restricted. No photographs are to be taken except by the coroner. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a

Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 24 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

3.3.6 Energy

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy. Would the Project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Environmental Setting:

The Project buildings would be designed to comply with the latest energy code standards that are required by the latest adopted building code. The City of Victorville's General Plan Resource Element provides goals, policies, and implementation measures for sustainable building design and development for industrial Project, reducing energy use and demand and promoting energy conservation on-site to the extent practicable.

Environmental Determination:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy?

Less Than Significant Impact. There is no existing energy use on the subject property. Construction of the Project would require consumption of petroleum fuels (primarily diesel) by the use of construction equipment on-site, by construction equipment delivering supplies to the site, and by construction workers traveling to and from the site. The energy required by construction would be temporary and would not be substantial. For the finishing phase of construction, some electricity may be used (e.g., for power tools and work lighting). Electricity usage is anticipated to be relatively minor compared to normal building operations. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The Project would be designed and operated in accordance with the applicable California Building Code (CBC) Title 24 regulations and the latest energy code standards, which impose energy conservation measures. The majority of the energy usage in the Project would consist of lighting and climate control. Adherence to the aforementioned energy

requirements will ensure conformance with the State's goal of promoting energy and lighting efficiency.

The Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operations. Therefore, energy impact of the Project would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. As noted above, the energy required for construction would be temporary and would not be substantial. Due to the Project design, construction, and the nature of operational energy use, the Project would not conflict or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, the Project would result in a less than significant impact on energy.

Mitigation Measures:

None required.

3.3.7 Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils. Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Setting:

According to the City of Victorville General Plan, the City is located in an area of high seismic activity. The probability of a major earthquake from the San Andreas, Helendale, and San Jacinto Faults is considered to be high.

There are no faults or fault traces that are known or suspected to exist within the City of Victorville. No Alquist-Priolo Special Studies Zones are located within the City. Therefore, the Project is not located within an Alquist-Priolo Earthquake Fault zone since there is no evidence of a “potentially active fault” located in the area.

The City’s Housing Element requires all new development to employ design and construction techniques that will reduce the potential for loss of life, injury, and property damage in the event of a major earthquake (City of Victorville 2008a).

Geologic and soils information presented in this section is based on a Project-specific Preliminary Geotechnical Interpretive Report prepared by Patel & Associates, Inc. dated August 1, 2022, included as Appendix D.1 of this document. A supplemental report prepared by Patel & Associates, Inc. regarding a feasibility study for planned installation of a septic system on the site is also provided as Appendix D.2.

Per the Paleontological Resources Assessment report prepared by SWCA, dated June 2023, the surface of the Project site is mapped as Pleistocene older alluvial fan deposits, unit 2 (Qof2). Additionally, Pleistocene Shoemaker Gravel may be present in the subsurface at unknown but possibly shallow depths. Both units have a high paleontological sensitivity. No previously known paleontological resources or fossil sites are present within the bounds of the Project site; however, several fossil localities have been recorded in the Victorville

Fan area from equivalent geologic units or sedimentary deposits. Although no new paleontological resources or fossil localities were identified during the survey, geologic units or sediments capable of preserving significant paleontological resources were observed. Therefore, the Project site has a high paleontological sensitivity at the surface and at depth. The maximum depth of ground-disturbing activities for the Project is anticipated to reach approximately 10 feet below ground surface (bgs). Based on the results of this assessment, ground-disturbing activities associated with the Project may impact geologic units of relatively high paleontological sensitivity. Any fossils encountered during ground disturbances in previously undisturbed sediments of high paleontological sensitivity would be at risk for damage or destruction from construction activities, which would constitute an impact under CEQA. A copy of the Paleontological Resources Assessment report is included in Appendix E.

Environmental Determination:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

No Impact. There are no faults or fault traces that are known to exist in the City. The City is not subject to the provisions of the Alquist-Priolo Fault Zoning Act. Therefore, the Project would not have an impact.

- ii. Strong seismic ground shaking?***

Less than Significant Impact. The City is located in an area with a high potential for severe ground shaking. The Project would be required to comply with the Victorville Municipal Code and the latest adopted version of the CBC to ensure that the Project's structures would adequately resist the ground-shaking forces of an earthquake. Therefore, the Project would result in a less than significant impact.

- iii. Seismic-related ground failure, including liquefaction?***

Less than Significant Impact. The Project is not located in an area considered a high risk for liquefaction. Areas abutting the Mojave River are typically areas where liquefaction may occur in the City. The three factors determining whether a site is likely to be subject to liquefaction include seismic shaking, type and consistency of earth materials, and groundwater level. The proposed structures will be supported by compacted fill and competent alluvium, with no shallow groundwater. As such, the potential for earthquake-induced liquefaction and lateral spreading beneath the proposed structures is considered very low to remote due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper on-site earth materials. Therefore, the Project would result in a less than significant impact.

iv. Landslides?

Less than Significant Impact. The Project is not located in an area determined to have slope hazards (City of Victorville, 2008b). Landslide debris was not observed during our subsurface exploration, and no ancient landslides are known to exist on the site. No landslides are known to exist or have been mapped in the vicinity of the site. Geologic mapping of the site conducted during the investigation and review of aerial imagery of the site reveal no geomorphic expressions indicative of land sliding. Therefore, the Project would result in a less than significant impact.

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

Less than Significant Impact. Due to the Project location, there would be no loss of topsoil or erosion. The Project would be required to comply with the Victorville Municipal Code and the latest adopted version of the CBC to ensure potential impacts related to soil erosion, landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant. Therefore, the Project would result in a less than significant impact.

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

Less than Significant Impact. The Project would not be located on 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 Project would be required to comply with the Victorville Municipal Code and the latest adopted version of the CBC to ensure potential impacts related to soil erosion, landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant. Therefore, the Project would result in a less than significant impact.

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

Less than Significant Impact. Preliminary laboratory test results indicate on-site earth materials exhibit an expansion potential of very low as classified in accordance with the 2019 CBC Section 1803.5.3 and ASTM D4829. Since the on-site earth materials exhibit expansion indices of 20 or less, the design of slab on ground foundations is exempt from the procedures outlined in Section 1808.6.1 or 1808.6.2 (Patel & Associates, Inc., August 2022). Through compliance with the recommendations set forth within the Geology report prepared by Patel & Associates (Appendix D.1), and conformance with the applicable seismic design regulations, standards, and policies, the potential for the Project to be located on expansive soil, creating substantial risks to life or property, is considered less than significant.

e) 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?

Less than Significant Impact. The Project plans to include the use of a septic system for wastewater disposal. A study was completed to determine that the soils at the proposed location on-site are capable of supporting a septic system, see Appendix D.2. The

recommendation in this study for the design of this system will be incorporated and permits from the Regional Water Quality Control Board (RWQCB) and local water agency will be obtained as needed. Based on incorporating the recommendations in Appendix D.2 in the Project design, the impacts related to use of a septic system would be less than significant.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Less than Significant with Mitigation Incorporated. As noted in the Existing Setting section, the Paleontological Resources Report in Appendix E found that the Project site has a high potential for buried paleontological resources. Mitigation Measures GEO-1 through GEO-4 would reduce potential impacts to less than significant. With these measures in place, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, the Project would result in a less than significant impact to paleontological resources with mitigation incorporated.

Mitigation Measures:

Mitigation Measure GEO-1: Retain a Society of Vertebrate Paleontology (SVP)-qualified Paleontologist to oversee implementation of paleontological mitigation and to obtain a curation agreement with an accredited repository prior to the start of construction activities.

Mitigation Measure GEO-2: Conduct worker training to educate the construction crew on the legal requirements and procedures to follow in the event of a fossil discovery.

Mitigation Measure GEO-3: Have an SVP-qualified paleontological monitor conduct full-time paleontological monitoring during ground-disturbing activities that have the potential to impact previously undisturbed sediments (earthwork impacting only previously disturbed sediments should not need to be monitored regardless of depth).

Mitigation Measure GEO-4: Prepare a paleontological resources monitoring report upon the conclusion of ground-disturbing activities to document the paleontological monitoring efforts for the project and to describe any discoveries observed and/or recorded. If paleontological resources are curated, submit the final monitoring report and any associated data pertinent to the curated specimen(s) to the designated repository.

3.3.8 Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions. Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Setting:

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does.

The accumulation of GHGs has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone, and water vapor.

While the presence of the primary GHGs in the atmosphere is naturally occurring, CO₂, CH₄, and N₂O are also emitted from human activities, accelerating the rate at which these compounds occur within Earth's atmosphere. Emissions of CO₂ are largely byproducts of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, which are generated in certain industrial processes. Refrigerants (R) can also be emitted and act as ozone depleting substances.

CO₂ is the reference gas for climate change because it is the predominant GHG emitted. The effect that each of the aforementioned gases can have on global warming is a combination of the mass of their emissions and their global warming potential (GWP). GWP indicates, on a pound-for-pound basis, how much a gas is predicted to contribute to global warming relative to how much warming would be predicted to be caused by the same mass of CO₂. CH₄ and N₂O are substantially more potent GHGs than CO₂, with GWPs of 25 and 310 times that of CO₂, respectively.

In emissions inventories, GHG emissions are typically reported in terms of pounds or metric tons (MT) of CO₂ equivalent (CO₂e) per year. CO₂e is calculated as the product of the mass emitted of a given GHG and its specific GWP. While CH₄ and N₂O have much higher GWPs than CO₂, CO₂ is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO₂e.

There is international scientific consensus that human-caused increases in GHG emissions have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts on agriculture, changes in disease vectors, and changes in habitat and biodiversity (CalEPA, 2006).

Regulatory Setting

In order to reduce GHG emissions, California enacted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 is a California State Law that fights global warming by establishing a comprehensive program to reduce GHG emissions from all sources throughout the State. According to the CARB, AB 32 was the first program in the country to take a comprehensive, long-term approach to addressing climate change. By requiring a sharp reduction of GHG emissions by law, California set the stage for its transition to a sustainable, low-carbon future.

In response to AB 32, the San Bernardino County Board of Supervisors adopted a Greenhouse Gas Reduction Plan (GHGRP) in 2011. This GHGRP established an inventory of GHG emissions in the County and presented a comprehensive set of actions to reduce the County's GHG emissions by 15% by 2020, consistent with the AB 32 Scoping Plan developed by the CARB. Chapter 4 of the GHGRP outlines the County's strategy to attain the GHG reduction target as follows:

“Measurable reductions of GHG emissions will be achieved through the County's GHG Development Review Process (DRP) by applying appropriate reduction requirements as part of the discretionary approval of new development projects. Through its development review process, the County will implement CEQA requiring new development projects to quantify project GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance. Mitigation of GHG emissions impacts through the DRP provides one of the most substantial reduction strategies for reducing external emissions. The DRP procedures for evaluating GHG impacts and determining significance for CEQA purposes will be streamlined by (1) applying a uniform set of performance standards to all development projects, and (2) utilizing Screening Tables to mitigate project GHG emissions. Projects will have the option of preparing a project-specific technical analysis to quantify and mitigate GHG emissions. A review standard of 3,000 metric tons per year (MTY) will be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions.”

Further:

“ ... With the application of the GHG performance standards, projects that are exempt from CEQA and small projects that do not exceed 3,000 MT CO₂e per year will be considered to be consistent with the Plan and determined to have a less than significant individual and cumulative impact for GHG emissions.”

An update to the County's GHGRP was necessitated because the State enacted new climate change regulations, most notably the Senate Bill (SB) 32. SB 32 expanded upon AB 32 to further reduce GHG emissions. SB 32 was signed into law on September 8, 2016 and provided statewide targets to reduce GHG emissions to 40 percent below 1990 levels by 2030. To meet these new GHG reduction targets, the San Bernardino County Board of Supervisors adopted a Greenhouse Gas Reduction Plan Update (GHGRP Update) in September 2021. The GHGRP Update includes a comprehensive review of GHG regulatory developments in California. Additional measures identified were incorporated into the GHGRP Update. However, the same 3,000 MT CO₂e per year review standard threshold was maintained.

Roughly concurrently, a project partnership, led by San Bernardino County Transportation Authority (SBCTA), compiled an inventory of GHG emissions and developed reduction measures that could be adopted by the 25 Partnership Jurisdictions of San Bernardino County, including the City of Victorville. The San Bernardino County Regional Greenhouse Gas Reduction Plan (Regional Plan) was finalized in March 2021 to serve as the basis for cities in the County to develop more detailed community level climate action plans.

In September 2015, the City adopted a Climate Action Plan (CAP), which is a guideline document on how the City will reduce GHG emissions in order to comply with AB 32. The City's CAP addresses new construction in the City across all industries including residential, commercial, industrial, municipal/public, and institutional projects. According to the summary at the beginning, the CAP "allows for the streamlining of projects by allowing developers to demonstrate that their project is consistent with the CAP. By demonstrating this through a screening table process, developers will not have to conduct a complete GHG analysis on their own to comply with CEQA." The CAP identifies the County's review standard of 3,000 MT CO₂e per year as the screening threshold. For this proposed Project, the applicant has chosen to perform a more detailed GHG analysis rather than utilize the City's screening table. The GHG analysis uses estimates of the GHG emissions for the proposed Project as described below to demonstrate consistency with the CAP.

Victorville is within the MDAQMD, which also reviews development projects as a responsible agency under CEQA to ensure that they do not exceed GHG emissions thresholds set by the air district. The MDAQMD has established a CEQA significance threshold of 100,000 short tons (90,718 MT) of CO₂e per year in its CEQA Guidelines (MDAQMD 2020).

GHG emissions for the proposed Project were calculated with CalEEMod, which as mentioned in Section 3.3.3, *Air Quality*, is the statewide land use emissions computer model designed to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from land use projects. Appendix A contains a technical report prepared by Yorke dated November 28, 2023, with details of the air quality and GHG emissions study.

Environmental Determination:

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

Less Than Significant Impact. Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Also included in GHG quantification is electric power used to pump the water supply (e.g., aqueducts, wells, pipelines) and disposal and decomposition of municipal waste in landfills (CARB 2017).

California's Building Energy Efficiency Standards are updated on an approximately 3-year cycle. The 2022 standards improved upon the 2019 standards for new construction of, and additions and alterations to, residential, commercial, and industrial buildings. The 2022 standards went into effect on January 1, 2023 (CEC 2022).

Since the CBC Title 24 standards require energy conservation features in new construction [e.g., high-efficiency lighting; high-efficiency heating, ventilation, and air conditioning (HVAC) systems; thermal insulation; double-glazed windows; water conserving plumbing fixtures; etc.), they indirectly regulate and reduce GHG emissions.

Using CalEEMod, direct on-site and off-site GHG emissions were estimated for construction and operation, and indirect off-site GHG emissions were estimated to account for electric power used by the proposed Project, water conveyance, and solid waste disposal. Table 3-3 shows the maximum GHG emissions based on CalEEMod (See Appendix A) and evaluates emissions against the MDAQMD significance threshold and San Bernardino County review standard. Off-site traffic impacts are included in these emissions estimates, along with construction emissions amortized over 30 years.

As shown in Table 3-3, GHG emissions are below the MDAQMD significance threshold and San Bernardino County's screening threshold of 3,000 MT CO₂e per year. Thus, the Project would result in a less than significant impact due to GHG emissions.

Table 5-6: Greenhouse Gas Emissions Summary and Significance Evaluation

GHGs	Maximum Emissions¹ (MT/yr)	Thresholds² (MT/yr)	Significant?
CO ₂	750	—	—
CH ₄	1.4	—	—
N ₂ O	0.01	—	—
R	5	—	—
CO ₂ e	794	90,718/3,000	NO

Source: CalEEMod version 2022.1.1.20

Notes:

1. The maximum emissions include the annual operational emissions plus construction emissions amortized over 30 years.
2. MDAQMD 2020/San Bernardino County 2015

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

Less Than Significant Impact. With the passage of AB 32, the Global Warming Solutions Act of 2006, jurisdictions are required to reduce their GHG emissions to 1990 levels by 2020, as well as comply with other post-2020 reduction targets. To comply with this regulation, in 2008 the Victorville City Council authorized and directed staff to partner with San Bernardino Council of Governments (SBCOG) to conduct a countywide GHG emissions inventory and GHG Reduction Plan. With that process complete, the City of Victorville has adopted a CAP to demonstrate how the City will reduce its GHG emissions in compliance with AB 32. The CAP is not an additional regulation created by the City, inasmuch as the regulation to reduce GHGs already exists under CEQA, including Section 15064.4 Determining the Significance of Impacts from GHG Emissions. The City's CAP ensures that development of new residential and commercial buildings include high energy-efficiency standards such as use of renewable energy source and management of facilities to reduce emissions due to the use of electricity and natural gas.

The Project would be designed and operated in accordance with the applicable CBC Title 24 regulations and the latest energy code standards, which impose energy and water conservation measures. The majority of the energy usage in the Project would consist of lighting and climate control. Adherence to the aforementioned energy requirements will ensure conformance with the State's goal of promoting energy and lighting efficiency.

Additionally, as shown in Table 3-3, maximum GHG emissions are below the MDAQMD significance threshold for land use projects and San Bernardino County's screening threshold of 3,000 MT CO₂e per year.

The CAP includes a building energy goal of 29 percent emission reduction for 2020 and has met the goal by reducing the projected 2020 emissions from 607,252 MT CO₂e to 422,592 MT CO₂e. The construction and operation of the proposed Project would account for less than 0.2 percent of the total 422,592 MT CO₂e.

Therefore, the proposed Project would be consistent with the City's CAP, policies and regulations adopted for the purpose of reducing the emissions of GHGs, as well as the County's GHGRP, which in concert with AB 32 and SB 32, reflect specific local requirements that would substantially lessen cumulative GHG emissions impacts.

Therefore, the project would be considered consistent with the City's GHG-reduction strategy and the City's CAP, and therefore, the Project would result in a less than significant impact from GHG emissions.

Mitigation Measures:

None required.

3.3.9 Hazards and Hazardous Materials

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

Environmental Setting:

As defined in Section 25117 of the California Health and Safety Code, a hazardous material is any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health or the environment if released into the workplace or the environment. Hazardous substances can take the form of a solid, dust, liquid, or fume and exhibit any of the criteria set forth in 22 CCR Chapter 30, Article 11. A list of wastes that are presumed hazardous is presented in 22 CCR Chapter 30, Article 9. Hazardous waste criteria include toxicity, ignitability, reactivity, and corrosivity.

The City of Victorville's General Plan Safety Element is intended to identify and, whenever possible, reduce the impact of natural and manmade hazards which may threaten the health, safety, and property of the residents living and working in the Victorville Planning Area.

The Hazardous Waste and Substances Sites (Cortese) List website, maintained by the California Department of Toxic Substances Control (DTSC), indicates that there are no listed sites in the City.

The Project-specific Phase I Environmental Site Assessment prepared by Ninyo & Moore dated March 22, 2023, is included as Appendix F of this IS/MND.

Environmental Determination:

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

Less Than Significant Impact. A significant impact would occur if the proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed Project would involve transport, use, and disposal of hazardous materials, including paints, solvents, oils, grease, and caulking. The rental contracts for the storage units would prohibit the storage of hazardous materials, and hence the Project would not use or store hazardous materials during operations. Impacts would be less than significant.

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

Less Than Significant Impact. During construction of the Project, the use of hazardous substances would be limited in nature and subject to standard handling and storage of equipment. Although highly unlikely, the release of hazardous materials could occur during construction on any Project. Any such releases would most likely be minor spillages of motor vehicle fuels and oils. The Project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) (See Section 3.3.10), which would include Best Management Practices (BMPs) to be implemented during construction to avoid spills, immediately respond to any spills, and minimize the effects of such spills. The use and handling of chemicals during construction activities would occur in accordance with applicable federal, State, and local laws, including California Division of Occupational Safety and Health (Cal/OSHA) requirements. During construction, it is highly unlikely

that the release of hazardous materials at a level that would present a hazard to the environment or to human or animal life would occur. The Project would not use or store hazardous materials. Therefore, the Project would result in a less than significant impact.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are three existing schools (University Preparatory School, Silverado High School, and Cobalt Middle School) within 0.5 miles of the Project. Project construction would comply with applicable regulations for the use and transport of hazardous materials. Furthermore, the rental contracts for the storage units would prohibit the storage of hazardous materials, and hence the Project would not use or store hazardous materials during operations. Therefore, the Project would result in a less than significant impact related to hazardous materials.

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

No Impact. The DTSC and State Water Resources Control Board (SWRCB) compile and update lists of hazardous material sites pursuant to Government Code Section 65962.5. The subject property is not included in the databases maintained by the DTSC's EnviroStor (DTSC 2020) or in the SWRCB Geotracker (SWRCB 2020). Additionally, adjoining properties and other facilities within 1 mile of the subject property were reviewed in the environmental database report and were not found to be an environmental concern to the subject property. Therefore, the Project would not have an impact due to being on a contaminated site.

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?

No Impact. The proposed Project is located more than 2 miles from a public airport or public use airport and is not located within any airport land use plans. The nearest airports are the Southern California Logistics Airport (SCLA), located approximately 5.5 miles north and Adelanto Airport, located approximately 6 miles northwest, of the proposed Project site. Therefore, no impacts regarding safety hazards or excessive noise for people residing or working in the Project area would occur.

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

Less than Significant Impact. The Project would not impair or interfere with any future emergency response plan or emergency evacuation plan. The Project would include a secondary access emergency entrance/exit on Amethyst Road for use in emergency situations. The circulation of the emergency entrance/exit would not affect surrounding land uses. Ongoing coordination with the local fire and police departments during construction would ensure that potential interference with emergency response and evacuation efforts are avoided. Therefore, the potential for the proposed Project to impair

implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is considered less than significant.

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

Less than Significant Impact. Due to the location, nature, and topography of the Project, which is relatively flat land, the Project would not expose people or structures to significant loss, injury or death involving wildland fires (See Section 3.3.20). Therefore, the Project would result in a less than significant impact.

Mitigation Measures:

None required.

3.3.10 Hydrology and Water Quality

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality. Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in a substantial erosion or siltation on- or off-site;				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv) impede or redirect flood flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Setting:

Hydrology and water quality information presented in this section is based on a Project-specific Preliminary Drainage Report and Water Quality Management Plan (WQMP) prepared by J.E. Miller & Associates dated April 2023, included as Appendix G of this document.

Stormtech infiltration chambers are proposed to retain and infiltrate storm water runoff from the proposed impervious improvements. For sizing purposes, APN 3105-291-01 was determined to be 99% impervious. The proposed drainage improvements will include v gutters within the drive isles that will convey flows east in the interior and then north around the perimeter of the project to drainage inlets that will drain to the stormtech chambers. The stormtech chambers are proposed to retain 39,008 cubic feet. Flow that exceeds the stormtech capacity will be discharged to the proposed 36-inch storm drain that discharges north. The site is compatible with development and can be developed. Drainage will be managed to avoid downstream drainage impacts by discharging less flow in the proposed condition and preserving the existing discharge location. This drainage report has demonstrated that the planned drainage infrastructure to convey off-site flows is adequately sized to convey and mitigate the 100-year storm event in an acceptable manner and comply with drainage criteria.

Storm water runoff from disturbed soils associated with construction activities is a common source of pollutants (mainly sediment) to receiving waters. Earthwork activities can loosen soils and sediments, making them more susceptible to erosion from storm water runoff and increasing the likelihood that these materials would migrate in storm water runoff to storm drains and downstream water bodies. In addition, construction would likely involve the use of various materials typically associated with construction activities such as paint, solvents, oil and grease, petroleum hydrocarbons, concrete, and associated concrete wash-out areas. If improperly handled, these materials could result in pollutants being

mobilized and transported off-site by storm water runoff (non-point source pollution) and degrade receiving water quality.

Environmental Determination:

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

Less Than Significant Impact. Construction activities would be required to comply with National Pollutant Discharge Elimination System (NPDES) regulations and obtain coverage under the Phase II Small Municipal Separate Storm Sewer System (MS4) General Permit in the Mojave River Watershed. The applicant or their contractor(s) would be required to implement construction BMPs as set forth in a detailed SWPPP. SWPPPs must be prepared by a Qualified SWPPP Developer (QSD) and implemented by a Qualified SWPPP Practitioner (QSP). SWPPPs must describe the specific erosion control and storm water quality BMPs needed to minimize pollutants in storm water runoff and detail their placement and proper installation. The BMPs are designed to prevent pollutants from contacting storm water and to keep all products of erosion and storm water pollutants from moving off-site into receiving waters.

In addition to erosion control BMPs, SWPPPs also include BMPs for preventing the discharge of pollutants other than sediment (e.g., paint, solvents, concrete, petroleum products) to downstream waters. BMPs for pollutants include designated, protected storage areas, routine inspections by the QSP for equipment leaks, maintaining containers of supplies to ensure the contents are clearly labeled and the integrity of the containers is not compromised, and ensuring that construction materials are disposed of in accordance with applicable regulations.

Furthermore, the Project would also comply with the mandated City-approved WQMP to minimize water pollutants of concern and document implementation of all required BMPs. Compliance with the requirements of NPDES regulations, the Phase II Small MS4 General Permit in the Mojave River Watershed, the City-approved WQMP, and the implementation of all associated BMPs would prevent the discharge of pollutants to surface waters or groundwater and minimize or eliminate potential degradation of surface water or groundwater quality during construction of the Project.

The type and concentration of substances in urban storm water can vary considerably, both during the course of a storm event and from event to event at any given area (based on the intensity of rainfall), as well as from site to site within a given urban area (based on land use characteristics) (U.S. EPA 1993). Following construction, Project operations would not result in increases of water quality constituent concentrations (such as bacteria and microorganisms, metals, and total suspended solids) transported by storm water above baseline concentrations in a manner that would have discernible impacts on or directly degrade water quality on-site or off-site.

A septic system will be installed on-site for sanitary wastewater disposal for the manager's apartment and office restroom. The septic system will meet applicable requirements to prevent groundwater impacts. See Appendix D.2 for more information.

Therefore, water quality impacts related to violation of water quality standards or degradation of water quality from implementation of the Project would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project would be served by the municipal water system for potable water and would not include installation of groundwater wells or long-term direct groundwater extraction. The Project will connect to an existing water main that is adjacent to the southern tip of the Project site on the east side of Amethyst Road, so will not involve any substantial off-site pipeline construction. The City will provide potable water to the Project under a preliminary agreement.

The addition of impervious surfaces, while potentially concentrating runoff, would not markedly alter local groundwater recharge. Implementation of the Project would not substantially alter local groundwater recharge. Proposed drainage improvements on APN 3105-291-01 include v gutter and one 36" storm drain system. Drainage flows will be collected in proposed v gutter in the drive isles and directed to storm drain inlets that will drain to a stormtech chamber. The chamber, when full, will spill downstream and discharge to 36" reinforced concrete pipe (RCP) that will convey off-site flows through the site and discharge at the historical discharge location. Drainage will be managed to ensure flows from proposed impervious surfaces will be drained to the stormtech chamber for infiltration.

Therefore, the Project would not interfere with groundwater recharge, and impacts related to groundwater depletion and interference with groundwater recharge would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. result in a substantial erosion or situation on- or off-site;***
- ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; and***
- iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
- iv. Impede or redirect flood flows?***

Less than Significant Impact. Project site development would not involve the alteration of a stream or river and would not substantially alter on-site drainage patterns. There are no existing streams or rivers that traverse the Project. Drainage flows will be collected in proposed v gutter in the drive isles and directed to storm drain inlets that will drain to a stormtech chamber. The chamber, when full, will spill downstream and discharge to 36" RCP that will convey off-site flows through the site and discharge at the historical discharge location. Once flow is conveyed off-site and into the urban storm water drainage

system, the potential for erosion is minimal. Therefore, impacts related to erosion and/or siltation due to altered drainage patterns would be less than significant.

The proposed improvements on-site are not located within a flood hazard risk area associated with a 100-year flood and would not result in substantially altered on-site surface water drainage patterns. Implementing the Project would result in minimal increases in storm water runoff flowing into the on-site drainage ditch and into the City storm water drainage system. The impervious surface area associated with the proposed storage area would not substantially increase the rate or amount of surface runoff to the extent that the Project increases flood risk on-site or off-site. Furthermore, the Project would require approval of a City-approved hydrology study and WQMP and implementation of a City-approved drainage plan designed with sufficient capacity to retain storm water on-site such that post-Project peak storm water runoff matches pre-Project conditions. The Project would also include any required improvements in accordance with the City's Municipal Code. With implementation of an approved drainage plan, impacts related to flooding due to altered drainage patterns or the addition of impervious surfaces following completion of construction would be less than significant.

The Project would not result in new sources of pollutants that could be transported via storm runoff to off-site receiving waters. Impacts related to creating additional sources of polluted runoff would be less than significant. The applicant would be required to prepare and implement a City-approved drainage plan for the Project to ensure post-Project storm water runoff and drainage matches pre-Project conditions from the recommendations of the hydrology study and the WQMP. The drainage plan would include hydrology analysis criteria to determine runoff volumes as well as design criteria for drainage systems. The drainage plan is required to quantify the amount of new impervious area and shall quantify the increase in the rate of storm water runoff associated with the Project. To the maximum extent feasible, the drainage plan would include measures such as limiting soil compaction, minimizing impervious surfaces, dispersing runoff to landscaping or other pervious areas on-site, conserving natural areas, and protecting drainage channels from erosion on-site.

The City would review and approve the drainage plan and all recommended design features for storm water management on-site (including drain pipe requirements and future uses of proposed storm drains) and would provide any additional recommended improvements to the storm drainage facilities and design in accordance with applicable civil engineering standards and City regulatory standards prior to accepting the drainage plan (as well as all recommendations from the Drainage Report and WQMP) and issuing a building permit. Therefore, the Project would have a less than significant impact.

The Project is not within a Special Flood Hazard Area and according to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, the project site is not within a flood zone. The subject area is listed as unshaded Zone X in the Safety Element (City of Victorville General Plan, 2008). Therefore, impacts related to impeding or redirecting flood flows would be less than significant.

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

Less Than Significant Impact. The Project is not located within a tsunami hazard inundation zone and is not in an area subject to current or projected future coastal flooding. A seiche is caused by oscillation of the surface of a large enclosed or semi-enclosed body of water due to an earthquake or large wind event. The Project is not located near a large enclosed or semi-enclosed body of water. The subject area is listed as unshaded Zone X in the Safety Element (City of Victorville General Plan 2008). The Project would not result in an increase in flood risk at the Project site. Therefore, impacts related to the release of pollutants due to inundation would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed above, no water quality degradation or groundwater impacts would occur as a result of the Project. The Project would have a less than significant impact on surface water and groundwater quality on-site and off-site. The Project would comply with the requirements under the NPDES Permit program, the Phase II Small MS4 General Permit in the Mojave River Watershed, the City-approved WQMP, and the implementation of associated BMPs and other requirements of SWPPP, as well as a City-approved drainage plan, which will ensure storm water discharges associated with construction and use of the Project comply with regulatory requirements in the City. The Project would not require ongoing groundwater withdrawals or substantially reduce groundwater recharge and therefore would not conflict with or obstruct implementation of a sustainable groundwater management plan. As discussed, the drainage plan would ensure that there would be no increase in peak storm water runoff from the Project. Therefore, impacts relating to conflict or obstruction of implementing a water quality control plan or sustainable groundwater management plan would be less than significant.

Mitigation Measures:

None required.

3.3.11 Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning. Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Environmental Determination:

a) Physically divide an established community?

No Impact. A significant impact would occur if the proposed Project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The proposed Project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The Project area is currently zoned as C-1 (Neighborhood Service District) land use. The neighborhood service district is consistent with the commercial land use designation of the General Plan. Thus, the proposed Project is consistent with the current zoning. Therefore, the Project would not divide an established community and mitigation is not required.

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

No Impact. As stated above, the Project is consistent with zoning policies and existing permitted land uses within each zone. Therefore, the development would not conflict with any applicable land use plan, policy, or regulation, and an impact would not occur.

Mitigation Measures:

None required.

3.3.12 Mineral Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources. Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Determination:

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

No Impact. The Project would be located in an area designated as MRZ-3a (City of Victorville General Plan 2008). This designation notes that areas within its boundary may contain significant aggregate deposits. However, further exploration work would be required to explore the subject property's potential to contain mineral resources. Mining areas in the City have historically been located along the Mojave River and in the North Mojave and Northern Expansion planning areas, and it is unlikely that the Project would contain mineral resources that would be locally important or of value to the residents of the State. Therefore, the Project would not have an impact on mineral resources.

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

No Impact. The Project would be located in an area designated as MRZ-3a (City of Victorville General Plan, 2008). This designation notes that areas within its boundary may contain significant aggregate deposits. However, further exploration work would be required to explore the subject property's potential to contain mineral resources. Mining areas in the City have historically been located along the Mojave River and in the North Mojave and Northern Expansion planning areas, and it is unlikely that the Project would result in the loss of availability of a locally important mineral resource recovery site. Therefore, the Project would not have an impact on mineral resources.

Mitigation Measures:

None required.

3.3.13 Noise

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

Environmental Setting:

Appendix H contains a technical report prepared by Yorke dated November 28, 2023, with additional information regarding noise and the details of the noise study.

Noise is typically described as any dissonant, unwanted, or objectionable sound. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity, the A-weighted decibel scale (dBA). In most situations, a 3-dBA change in sound pressure is considered a “just detectable” difference. A 5-dBA change (either louder or quieter) is readily noticeable, and a 10-dBA change is a doubling (if louder) or halving (if quieter) of the subjective loudness. Sound from a small, localized source (a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (drops off) at a rate of 6 dBA for each doubling of the distance.

The duration of noise and the time period at which it occurs are important factors in determining the impact of noise on sensitive receptors. A single number called the equivalent continuous noise level (L_{eq}) may be used to describe sound that is changing in level. It is also used to describe the acoustic range of the noise source being measured, which is accomplished through the maximum L_{eq} (L_{max}) and minimum L_{eq} (L_{min}) indicators.

In determining the daily measure of community noise, it is important to account for the difference in human response to daytime and nighttime noise. Noise is more disturbing at night than during the day, and noise indices have been developed to account for the varying duration of noise events over time, as well as community response to them. The Community Noise Equivalent Level (CNEL) adds a 5-dB penalty to the “nighttime” hourly noise levels (HNLs) (i.e., 7:00 p.m. to 10:00 p.m.) and the Day-Night Average Level (L_{dn}) adds a 10-dB penalty to the evening HNLs (Caltrans 2020, FTA 2006).

Regulatory Setting:

The City of Victorville General Plan, Land Use Compatibility Standards contains criteria to determine the compatibility of proposed developments. For commercial land uses, an L_{dn} or CNEL limit (threshold) of 70 dBA is considered “Normally Acceptable” and CNEL of 70-75 dBA is considered “Conditionally Acceptable.” For this Project, the City of Victorville Municipal Code Sections 13.01.040 and 13.01.050 contain the applicable evaluation criteria. Section 13.01.040 includes the base ambient noise levels as shown in Table 3-4. If the ambient noise level exceeds the applicable limit as noted in the above table, the ambient noise level shall be the standard. Section 13.01.050 states that noise levels shall not exceed the ambient noise levels in Table 3-4 by the following dBA levels for the cumulative period of time specified:

- Less than 5 dBA for a cumulative period of more than 30 minutes in any hour;
- Less than 10 dBA for a cumulative period of more than 15 minutes in any hour;
- Less than 15 dBA for a cumulative period of more than 5 minutes in any hour;
- Less than 20 dBA for a cumulative period of more than 1 minute in any hour; and
- 20 dBA or more for any period of time.

Section 13.01.060, Subpart 9 exempts construction activities on private properties that are determined by the director of building and safety to be essential to the completion of a Project.

Table 7-4: City of Victorville Base Ambient Noise Levels

Zone	Noise Level (dBA)	
	10 p.m. to 7 a.m.	7 a.m. to 10 p.m.
All Residential Zones	55	65
All Commercial Zones	70	
All Industrial Zones	75	

Construction Noise Analysis

The proposed Project includes the development of a self-storage facility with an office and an on-site manager’s apartment and a parking lot. Most noise would occur during the site preparation, grading, and building construction when heavy equipment would be operating.

A noise study prepared by Yorke is provided in Appendix H, which provides additional information on the methodology used and the results. Table 3-5 gives the results of the noise study.

Table 8-5: Estimated Peak Activity Daytime Noise Impacts - Residential Receptors

Construction Phases	Compatible Criteria			
	Modeled Noise Level (L _{eq} dBA) ^a	CalEEMod Duration (days)	Significance Threshold (CNEL dBA) ^b	Exceeds Threshold (Yes/No)?
Background	65.0	—	—	No
Site Preparation	66.7	11	80	No
Grading	66.8	21	80	No
Building Construction	66.2	230	80	No
Paving	67.5	20	80	No
Architectural Coating	65.2	21	80	No
Long-Term Impact (Operational)	65.0	—	70 ^c	No

Sources: CalEEMod version 2022.1.1.20, FHWA 2006, Niland & Elam, 2021

Notes:

^a Includes ambient noise (cumulative impacts). Ambient noise is from the City of Victorville Municipal Code, Section 13.01.040.

^b FTA 2018.

^c City of Victorville General Plan, Land Use Compatibility Standards and City of Victorville Municipal Code, Section 13.01.050.

Operational Noise

Upon completion of construction and occupancy of the proposed Project, on-site operational noise would be generated mainly by HVAC equipment. Large HVAC systems could result in noise levels that average between 50 and 65 dBA L_{eq} at 50 feet from the equipment. However, the new HVAC equipment will be of quiet design per commercial standards. As such, the new HVAC equipment associated with the proposed Project would not increase the ambient noise levels for the nearest sensitive receptors.

As shown in Table 3-5, for commercial land uses, an L_{dn} or CNEL limit (threshold) of 70 dBA is considered “Normally Acceptable” and 70-75 dBA is considered “Conditionally Acceptable.” Therefore, the proposed Project will be in compliance with the noise limits set by the City of Victorville.

Environmental Determination:

- a) Generation of 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. Construction would be temporary and is estimated to take approximately 14 months. Construction activities would require the use of noise-generating equipment. The noise levels generated by typical construction equipment would greatly vary depending upon factors such as the type and specific model of the equipment, the operation being performed, the condition of the equipment and the prevailing wind direction. Increases in noise levels from construction activities would be temporary within the Project vicinity and surrounding land uses. Construction noise levels would be short-term and are assumed under existing development standards. Additionally,

the City of Victorville Municipal Code anticipates increases in temporary ambient noise from such occurrences from new development and regulates such activities through base ambient noise level time frames that would mitigate any potential adverse impacts. Once constructed, noise levels from operations of the Project would be minimal and compatible with the surrounding land uses and would not exceed noise level standards outlined in the General Plan and Municipal Code (Title 16 Chapter 6 Article 12). The residential dwelling on-site would not be exposed to noise levels that would be incompatible with the General Plan and Municipal Code. Therefore, impacts from temporary and permanent ambient noise levels in the vicinity of the proposed Project would be less than significant.

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

Less Than Significant Impact. Although there will be some excavation in typical soil for the Project area, construction plans do not include intense percussive actions (e.g., hard rock-breaking, large pile-driving). Therefore, no strong ground-borne vibrations are expected to be generated that could affect nearby structures or be noticeable to their occupants. The proposed Project would have a less than significant impact with regards to ground-borne vibration and 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 level?

No Impact. There is no public or private use airport within 2 miles of the Project site; therefore, the Project would not expose the public to excessive noise.

Mitigation Measures:

None required.

3.3.14 Population and Housing

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing. Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Determination:

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

No Impact. Due to the size and development nature of the Project, there would be no substantial direct or indirect population growth in the City. Therefore, the Project would have no impact.

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

No Impact. Due to the size and development nature of the Project, the proposed Project will not displace substantial numbers of existing people or housing as no existing housing or areas currently designated for housing will be removed or reduced. Therefore, the Project would have no impact on population and housing.

Mitigation Measures:

None required.

3.3.15 Public Services

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services. Would the Project:				
a) 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?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Environmental Setting:

Fire Protection

Fire protection within the City of Victorville is provided by the City of Victorville Fire Department. The City of Victorville Fire Department has six fire stations that are manned and operated. Two of the fire stations are located within 1.5 miles of the Project.

Police Protection

Police service in the City of Victorville is provided by the San Bernardino County Sheriff's Department. The department includes 80 offices and 22 non-sworn positions. The Victorville Sheriff's Department is located approximately 1.7 miles northeast of the Project.

Environmental Determination:

a) 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?

Less Than Significant Impact. The Project would not provide storage for flammable materials and would not be constructed of flammable materials. Construction would have a low fire hazard due to the materials that would be used for Project design. The Project would comply with applicable City fire prevention and protection requirements, including building/site design requirements and provisions for fire protection services. There are two fire stations within 1.5 miles of the Project and response times would be expected to be prompt, when needed. The Project would not affect response times or other performance objectives at the fire department. The Project would provide emergency access to the fire

department in the event of an emergency. Additionally, City Municipal Code Section 16-5.01.080 establishes Development Impact Fees applicable to all development projects for the purpose of defraying the cost of public facilities (including public improvements, public services, and community amenities) resulting from the increased demand for public facilities reasonably related to the development project. This is a standard Condition of Approval and pursuant to CEQA is not considered mitigation. Therefore, impacts related to fire protection would be less than significant.

Police Protection?

Less Than Significant Impact. The Project would necessitate normal police services required by the rest of the City, when necessary. The police station is approximately 1.7 miles northeast of the Project and response times would be expected to be prompt, when needed. The Project would not affect response times or other performance objectives at the police department. Additionally, City Municipal Code Section 16-5.01.080 establishes Development Impact Fees applicable to all development projects for the purpose of defraying the cost of public facilities (including public improvements, public services, and community amenities) resulting from the increased demand for public facilities reasonably related to the development project. This is a standard Condition of Approval and pursuant to CEQA is not considered mitigation. Therefore, impacts related to police protection would be less than significant.

Schools?

No Impact. The number of workers needed for operation of the Project would be low, hence there would be no impact to schools in the City.

Parks?

No Impact. The number of workers needed for operation of the Project would be low, hence there would be no impact to parks in the City.

Other Public Facilities?

No Impact. Due to the nature of the Project, there would be no impact on other public facilities in the City.

Mitigation Measures:

None required.

3.3.16 Recreation

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Environmental Determination:

- 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. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Project will not result in the addition of any new residential units that would potentially lead to increased use of existing neighborhood and regional parks or other recreational facilities. The proposed self-storage use at the site would not require a significant number of employees as compared to other commercial and light industrial uses. The Project would not increase the use of recreational facilities. Therefore, the Project would have no impact on recreation.

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

No Impact. The Project would not include or require the construction or expansion of recreational facilities. The Project involves the construction of a self-storage facility. The Project would not result in the addition of any residential units would otherwise potentially include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. As such, no impact would occur.

Mitigation Measures:

None required.

3.3.17 Transportation

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation. Would the Project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Environmental Setting:

The City of Victorville's Resolution No. 20-031 was approved and adopted on June 23, 2020, and became effective on July 1, 2020. This resolution establishes Vehicle Miles Traveled (VMT) Analysis Guidelines. According to the City's adopted VMT Guidelines, projects that will not require a VMT analysis can be screened using either the daily vehicle trips generated by the project or the project's land use type. The daily vehicle trip threshold is a net increase of 1,285 or less weekday daily trips.

A Trip Generation and VMT Screening Analysis was prepared for the proposed Project by RK Engineering Group, Inc. on February 27, 2023 (Appendix I). The Institute of Transportation Engineers (ITE) Trip Generation Manual was used to estimate the daily trip generation. The proposed Project is forecast to generate approximately 177 weekday daily trips, which is less than the 1,285 weekday daily trips threshold.

Environmental Determination:

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

Less Than Significant Impact. The Project would result in vehicle trips during construction and operation of the facility. Vehicles associated with construction of the Project would likely use regional and local roadways to access the site, primarily Highway

395, Palmdale Road, and Mojave Freeway (I-15). Vehicle trips would consist of required construction material or equipment deliveries and construction worker trips. Vehicle trips during operation would consist of people using the self-storage units. Project construction and operation would not conflict with any program, plan, or policy addressing the circulation system in the City. Therefore, the Project would have a less than significant impact on traffic.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. Project operations would generate approximately 177 trips per day. Based on screening thresholds for small land use projects established in the City's Resolution No. 20-031 for VMT thresholds, Project trips would be well below the threshold of 1,285 trips per day. Thus, a detailed VMT analysis using a travel demand model or tool to quantify the VMT associated with the Project is not required, and the Project would have a less than significant impact on traffic.

c) 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. The Project would not involve any new hazardous design or features nor introduce any new uses that would be incompatible with transportation. The Project would not include sharp curves or dangerous intersections. The Project would not alter site access since customers would access the main entrance using existing City roads. Therefore, the Project would not increase hazards and would result in a less than significant impact.

d) Result in inadequate emergency access?

Less than Significant Impact. The Project would not affect emergency response routes. The Project would include a secondary access emergency entrance/exit for the Project site. Therefore, the Project would result in a less than significant impact.

Mitigation Measures:

None required.

3.3.18 Tribal Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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) 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) 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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Environmental Setting:

The City of Victorville commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to PRC Section 21080.3.1. YSMN responded to the notification stating that YSMN did not have concerns with the Project's implementation. YSMN suggested Mitigation Measures for cultural resources/TCRs that have been included as Mitigation Measures in this IS/MND. MBMI also responded to the notification and requested the Geotechnical Report prepared for the Project and other Project plans so MBMI could better understand the extent of the excavation for the Project and the geology of the Project area. After review of the Cultural Resource Assessment, MBMI suggested Mitigation Measures for cultural resources/TCRs that have been included as Mitigation Measures in this section or Section 3.3.5, *Cultural Resources*.

Environmental Determination:

- a) ***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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. 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)*
- ii. 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Less Than Significant with Mitigation Incorporated. As previously noted, the CHRIS records search identified eight previously recorded cultural resources within a 1.6-kilometer (1.0-mile) radius of the Project area. None of the cultural resources were within the Project area. Seven of the eight cultural resources identified were historic in age. The single prehistoric resource consisted of a lithic scatter (P-36-012839). The SLF search was positive for TCRs or potential TCRs. The cultural resources assessment report prepared by SWCA, dated June 2023 (included in Appendix C), states that the Project area has low to moderate sensitivity for prehistoric and historic resources.

Mitigation measures are proposed to address potential historic and archaeological resources (and possibly human remains) discovered during construction, including measures suggested by YSMN and MBMI. A copy of the Tribes' correspondence with the City is included in Appendix C.

Implementation of Mitigation Measures CUL-1 through CUL-6 under Cultural Resources and Mitigation Measures TCR-1 through TCR-2 below would reduce potentially significant impacts on TCRs to less than significant.

Mitigation Measures:

Mitigation Measure TCR-1: Tribal Agreement. Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Agreement with the appropriate tribal representative for the Project. Arrangements will be made such that the Tribal Monitor may be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources.

Mitigation Measure TCR-2: Reporting. All archaeological/cultural documents created as a part of the project (CRMP, isolate records, site records, survey reports, testing reports, final report, etc.) shall be submitted to the Lead Agency and Consulting Tribe(s) for review and comment. After approval of the final report(s) by all involved parties, the final report(s) are to be submitted to the SCCIC and the Consulting Tribe(s).

3.3.19 Utilities and Service Systems

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the 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) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Determination:

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

Less than Significant Impact. For potable water, the Project would connect to an existing water main that is adjacent to the southern tip of the Project site on the east side of Amethyst Road, so relocation of construction of new off-site water facilities will not be needed.

Water demand would be minor, and water supplies would be provided to the Project by the City. A new septic system would be used for Project-generated wastewater, and would not require connection to the City's sewer system. The Project would be developed and operated in compliance with the City regulations and standards of the Lahontan RWQCB to ensure wastewater treatment requirements are achieved. The City of Victorville General Plan EIR concludes that City buildout pursuant to the General Plan would result in a less than significant impact to water supply and water treatment impacts. The Project would also be provided natural gas (Southwest Gas Corporation), electricity (Southern California Edison), and telecommunication services (various private services available).

Connection to existing services would be consistent with City and purveyor requirements. The implemented City-approved drainage plan would ensure that post-development storm water discharge rates would not exceed pre-development conditions. The City would apply recommendations from the hydrology study and the WQMP prior to approving a drainage plan. The Project's improvements needed to connect to existing services are expected from this type of development and the Project applicant would pay all applicable impact fees, water connection fees, and service fees required by the City and purveyors. Therefore, Project impacts would be less than significant with respect to hydrology and water quality.

b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. Water demand would be minor and water supplies would be provided to the Project by the City. The City of Victorville General Plan EIR concludes that City buildout pursuant to the General Plan would result in a less than significant impact to water supply. The Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies, and the Project would not otherwise impede the sustainable groundwater management of the basin. Therefore, potential impacts associated with sufficient water supplies available to serve the Project and reasonably foreseeable future development would be less than significant, and mitigation is not required.

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

Less than Significant Impact. The Project would be served by the City's sewer system and is not expected to exceed wastewater treatment requirements in the area. Additionally, the Project would pay all applicable impact fees, water and sewer connection fees, and service fees required by the City and purveyors. Therefore, impacts would be less than significant, and mitigation is not required.

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

Less than Significant Impact. Construction and operations would generate a very minimal amount of solid waste that would not be in excess of capacity of local infrastructure at the Victorville Landfill. Solid waste generation from construction and

operations would comply with all State and local standards related to solid waste. Therefore, impacts would be less than significant, and mitigation is not required.

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

Less than Significant Impact. Construction and operations would generate a minimal amount of solid waste that would not be in excess of capacity of local infrastructure at the Victorville Landfill. Solid waste generation from construction and operations would comply with all federal, State, and local statutes and regulations related to solid waste. Therefore, impacts would be less than significant, and mitigation is not required.

Mitigation Measures:

None required.

3.3.20 Wildfires

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Environmental Setting:

Due to the location of the Project and the surrounding land uses, wildland fire hazard would be minimal. Review of the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Viewer identifies that the City of Victorville is located in a Local Responsibility Area (LRA). The Project is not located in a Very High Fire Hazard Severity Zone (CAL FIRE 2022).

Environmental Determination:

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

Less than Significant Impact. The Project would include a secondary access emergency entrance/exit for use during a potential emergency. Ongoing coordination with the local fire and police departments during construction would ensure that potential interference with emergency response and evacuation efforts are avoided. Therefore, the potential for the proposed Project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is considered less than significant.

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

Less than Significant Impact. Due to the location and topography of the Project, which is relatively flat land, and inclusion of only one residence, the Project would not expose storage unit customers to pollutant concentrations from a wildfire. The Project would not be composed of flammable building materials that could contribute to an uncontrolled spread of wildfire. Therefore, the Project would result in a less than significant impact.

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

Less than Significant Impact. The Project would not require the installation or maintenance of associated infrastructure that would exacerbate fire risk or that would result in temporary ongoing impacts to the environment. The Project would include a secondary access emergency entrance/exit that would be properly maintained and not cause ongoing environmental impacts. Therefore, the Project would result in a less than significant impact.

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

Less than Significant Impact. The Project would not cause runoff, downslope or downstream flooding, or drainage changes. Due to the Project location and flat topography, potential impacts from landslides and post-fire slope instability would not be a concern. Therefore, the Project would result in a less than significant impact.

Mitigation Measures:

None required.

3.3.21 Mandatory Findings of Significance

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. Mandatory Findings of Significance.				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)	☐	☐	☒	☐
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Environmental Determination:

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

Less Than Significant with Mitigation Incorporated. The Project would not decrease the quality of the environment, reduce fish or wildlife population, or eliminate important examples of major periods of California history or prehistory. With implementation of Mitigation Measures BIO-1, Mitigation Measures CUL-1 through CUL-6, Mitigation Measures GEO-1 through GEO-4, and Mitigation Measures TCR-1 and TCR-2, Project impacts would be less than significant with mitigation incorporated.

b) Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)

Less Than Significant Impact. The Project would not have a cumulatively considerable impact on any of the environmental factors evaluated. Therefore, the Project would have a less than significant impact.

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

Less Than Significant Impact. The Project would not result in impacts to human beings that would result in substantial adverse effects on human beings, directly or indirectly. Therefore, the Project would result in a less than significant impact.

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APPENDIX A – AIR QUALITY AND GREENHOUSE GAS EMISSIONS STUDY

APPENDIX B – BIOLOGICAL RESOURCES ASSESSMENT

APPENDIX C – CULTURAL RESOURCE ASSESSMENT AND AB 52 CONSULTATION

APPENDIX D – GEOTECHNICAL AND SOILS REPORTS

APPENDIX D.1 PRELIMINARY GEOTECHNICAL INTERPRETIVE REPORT

APPENDIX D.2 FEASIBILITY REPORT FOR SEEPAGE PIT DESIGN

APPENDIX E – PALEONTOLOGICAL RESOURCES ASSESSMENT

APPENDIX F – PHASE I ENVIRONMENTAL SITE ASSESSMENT

APPENDIX G – PRELIMINARY DRAINAGE REPORT AND WATER QUALITY MANAGEMENT PLAN

APPENDIX H – NOISE IMPACT STUDY

APPENDIX I – TRIP GENERATION AND VMT SCREENING ANALYSIS