Challenger School of Sports and Fitness
Track and Field Project

Draft
Initial Study/Mitigated Negative Declaration

January 2026

Prepared for:

Victor Elementary School District
12219 2nd Avenue
Victorville, CA 92395

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1.0 INTRODUCTION

1.1 Purpose and Scope

The Victor Elementary School District (District) prepared this Initial Study/Mitigated Negative Declaration (IS/MND) to assess whether there may be significant environmental impacts associated with the District-proposed track and field (project) at the Challenger School of Sports and Fitness (Challenger School) located in the City of Victorville, California. The District has the principal responsibility for carrying out the project. Accordingly, it is the lead agency for ensuring environmental compliance for the project under the California Environmental Quality Act (CEQA).

In accordance with CEQA (California Public Resources Code Section 21000 et seq.) and its Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.), this IS/MND has been prepared to evaluate the potential environmental effects associated with the construction and operation of the project. It is consistent with the requirements of CEQA on the basis that there is no substantial evidence that the project would cause significant impacts on the environment after mitigation. Where the analysis identifies a potentially significant environmental impact, mitigation measures are identified to avoid or reduce the impact to a level of less than significant.

CEQA Guidelines Section 15070 states that a public agency shall prepare a negative declaration or MND for a project subject to CEQA when the initial study shows no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or the initial study identifies potentially significant effects but:

- Revisions in the project made before the IS/MND is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
- There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

CEQA Guidelines Section 15041 further provides that a lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards. As defined by State CEQA Guidelines Section 15364, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, considering economic, environmental, legal, social, and technological factors. If significant impacts are identified, then mitigation measures are adopted to reduce the impacts to less than significant levels.

As provided in CEQA Guidelines Section 15126.4, mitigation measures must include the following:

- A nexus (i.e., connection) between the mitigation measure and the environmental impact.
- The mitigation measure must be "roughly proportional" to the impacts of the project.

CEQA Guidelines Section 15370 further provides several forms of mitigation, including the following:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Compensating for the impact by replacing or providing substitute resources or environment.

This IS/MND evaluates the project's impacts on the following environmental resources:

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

1.2 Summary of Findings

Section 4.0 of this document contains the Environmental Checklist that was prepared for the project pursuant to Appendix G of the CEQA Guidelines. The Environmental Checklist indicates that the project would not result in significant impacts with the implementation of mitigation measures, as identified where applicable throughout this document.

1.3 Draft IS/MND Public Review Process

The Draft IS/MND and a Notice of Intent to adopt an MND will be distributed to responsible and trustee agencies, other affected agencies, and other parties for a 20-day public review period.

Written comments regarding this IS/MND should be addressed to:

Joe Pont, Director of Facilities, Transportation, Maintenance & Grounds
Victor Elementary School District
12219 2nd Avenue
Victorville, CA 92395
(760) 245-1691
jpont@vesd.net

Comments submitted to the District during the 20-day public review period will be considered and addressed prior to the adoption of the MND by the District.

1.4 Report Organization

This document has been organized into the following sections:

Section 1.0 – Introduction. This section provides an introduction and overview describing the conclusions of the Draft IS/MND.

Section 2.0 – Environmental Setting. This section describes the physical environmental conditions of the project site and surrounding areas.

Section 3.0 – Project Description. This section identifies key project characteristics and includes a list of anticipated discretionary actions.

Section 4.0 – Environmental Summary and Determination. The Environmental Checklist Form provides an overview of the potential impacts that may or may not result from project implementation. This section also summarizes the environmental factors that require mitigation and the determination of the type of documentation based on the evaluation in this Draft IS/MND.

Section 5.0 – Environmental Analysis. This section contains an analysis of environmental impacts identified in the environmental checklist.

Section 6.0 – List of Preparers. This section identifies the individuals who prepared this Draft IS/MND and technical studies and their areas of specialty.

2.0 ENVIRONMENTAL SETTING

2.1 Project Location

The project is proposed at the Challenger School of Sports and Fitness, located at 14777 Hopland Street in the City of Victorville, San Bernardino County. The school is south of Hopland Street and west of Cahuenga Road. Gloria Lane bisects Cahuenga Road at the southeast corner of the school. El Evado Road and Amargosa Road are approximately 0.25 miles, respectively, west and east of the school. Regional access to the campus is via Interstate 15, approximately 1.7 miles to the east, and State Route 395, approximately 3.3 miles to the west. Figure 1, *Regional Vicinity*, and Figure 2, *Site Vicinity*, show the project site from regional and local perspectives.

2.2 Existing Conditions

Challenger School is a public primary school that serves students in transitional kindergarten through sixth grade. The school's curriculum actively incorporates sports and fitness. A variety of after-school activities are offered at the school, including basketball, soccer, wrestling, cheerleading, volleyball, flag football, robotics, art, and career curriculum. The school's robotics, flag football, and basketball teams participate in local tournaments each year. The school's flag football programs offer scrimmage games against other youth teams and schools in the region.

The existing campus is south of Hopland Street and west of Cahuenga Road. A single-story building is located in the northern portion of the campus. The building has an "x" shape layout, as shown in Figure 2. The main entrance into the building is from Hopland Street. Visitor parking and school bus loading is along the northern perimeter of the campus. Staff parking and student loading is along the eastern perimeter. Hardtop play space is immediately west, south, and east of the building. The southern portion of the campus is developed with a multiuse grass field. Exterior security lighting is located around the school building and in the parking lots.

The elevation of the campus ranges from a high of approximately 2,910 feet above mean sea level (amsl) along the western perimeter to a low average of 2,885 feet amsl along the eastern perimeter. The area along the western perimeter is sloped with natural desertscape. There are retaining walls northwest and southwest of the school building and play spaces.

South of the school is a District-owned lot, with recorded Assessor Parcel Number 0395-244-17. The lot is approximately 6 acres and located southwest of the Cahuenga Road and Gloria Lane intersection. It is vacant with disturbed desert vegetation. West, south, and east of the lot is undeveloped desert. However, adjacent to the south and east are the planned future roads of Enramada Road and Cahuenga Road, respectively.

The project site covers an area of approximately 11.6 acres, and currently consists of vacant, undeveloped land as well as a portion of the grass sports field in the southwest corner of the Challenger School campus. The project site is surrounded by existing school facilities to the north and undeveloped natural desert habitat to the west, south, and east. As shown in Figure 2, Challenger School is in an area with sparse development. Very low- and low-density residential uses are north and east of the campus, respectively.

2.3 Land Use and Zoning

The project site is located in the City of Victorville. The project site's General Plan land use designation is Low Density Residential (LDR). The site is zoned R-1, Single Family Residential. The LDR designation is generally characterized by single-family detached residential development with a maximum density of 5 dwelling units per acre, which corresponds with the R-1 zoning.[1] Schools and other uses compatible with suburban low-density neighborhoods are allowable land uses under the LDR designation. Although the project would be a permitted use, the District Board of Education may exempt the project from the City of Victorville's zoning ordinances and regulations, including, without limitation, the City's Code of Ordinances, General Plan, and related ordinances and regulations that otherwise would be applicable.[2]

[1] City of Victorville, *Victorville Land Use Element*, December 2022, https://www.victorvilleca.gov/home/showpublisheddocument/13961/638237235345270000.
[2] California Government Code Section 53094 et seq.

Figure 1 Regional Vicinity

Figure 2 Site Vicinity

Figure 3 Conceptual Site Plan

<placeholder>

3.0 PROJECT DESCRIPTION

3.1 Proposed Improvements

The District proposes a track and field facility at Challenger School. The new facility, including a multiuse sports field and track, concessions and restroom building, and parking, would be constructed south of the existing school building and on an undeveloped, District-owned lot located south of the school. Figure 3, *Conceptual Site Plan*, shows the proposed improvements, which would be designed and constructed in compliance with the 2022 Title 24 California Building Standards Code (CBC), which includes the Building Code (Part 2), Energy Code (Part 6), and Green Building Code (Part 11, the CALGreen code); Americans with Disabilities Act (ADA); and District design and construction standards.

Track and Field

The new track and field would be oriented north-south and constructed along the western perimeter of the project site. The proposed track and field would be constructed over existing turf field. New replacement turf would be installed south of the existing eastern half of the field, along the parking lot. A natural turf field with an eight-lane, rubberized running track would be installed.

Bleachers. Home and visitor aluminum bleachers would be installed to provide seating for 2,000 spectators. The visitor bleachers would be on the west side of the track and include seating for 1,000 spectators. The home bleachers east of the track and field would also include 1,000 seats. The bleachers would be approximately 20 feet in height.

Scoreboard. A light-emitting diode (LED) scoreboard would be installed north of the track, behind the goal post. The scoreboard would face southward and be up to approximately 25 feet in height.

Light Poles. The new facility would include nighttime field lighting. A total of five poles would be installed to light the track and field and surrounding walkways. The poles would have a maximum height of approximately 80 feet. Light fixtures would be mounted at various heights on the poles to provide the minimum field lighting levels compliant with standards from the California Interscholastic Federation, as well as security and safety lighting along walkways. The fixtures on the top of the poles would be directed downward toward the fields and walkways. All fixtures would be hooded and shielded with louvers to minimize spill light, glare, and sky glow. The poles would also be mounted with speakers, cameras, and wireless access points.

New Concession/Restroom Building

A new approximately 1,500-square-foot building would be constructed southeast of the track and field, south of the home bleachers. The building would function as a tickets and concession booth. The building would also include restrooms.

Restroom Building

A second, approximately 400-square-foot restroom building would be constructed northwest of the track and field, north of the visitor bleachers. This building would include men's, women's, and gender-neutral restroom facilities.

Parking Lot

A surface lot with approximately 237 stalls would be constructed southeast of the proposed improvements. Access would be from a new driveway at the Cahuenga Road and Gloria Lane intersection.

Landscaping

New landscaping would be installed in the parking lot and along perimeter of the field, and would include a mix of trees, shrubs, and ground cover.

Utilities/Service Systems

New utility systems, including electricity, potable and irrigation water, and sewer, would be installed to support the proposed facilities. They would be connected to existing utility lines and systems on the campus. A new storm drain system of pipes, inlets, and catch basins would be installed below the development footprint, including below and around the track and field, varsity baseball field, tennis court facilities, new buildings, and areas with hardscape. Stormwater would be directed to an underground storm drain infiltration system located under the proposed parking lot, southeast of the proposed track and field. The new facilities would ensure that the rate of runoff would be similar to or slower than that existing and that runoff is treated.

3.2 Proposed Operation

The proposed track and field facility would be used for Challenger School's physical education program during normal school hours. After school, it would be used by the school's existing sports programs, including football, soccer, and track. Table 3.2-1, School Users, identifies the proposed track and field users and hours of operation per season.

TABLE 3.2-1: FACILITY USERS

Season	Facility Users	Hours
June – August	Football, Soccer, Track	3 PM – 9 PM
August – March	Football, Soccer, Track	4 PM – 8 PM
October – June	Football, Soccer, Track	4 PM – 8 PM

When the facility is not used by the school, it would be available for other District-sponsored events, such as the Junior Olympics, which is held annually over a two-day period; District-wide/multi-site events/competitions for any of the District's 18 schools; and potential student sports and employee events.

Similar to existing conditions with all District facilities, when the proposed facility is not used by the school or District, it would be available for use by the Victorville community, pursuant to the Civic Center Act and District policies. The public may rent the proposed track and field facility for a fee through the District's facility use agreement. For purposes of the analysis, it is assumed that existing community users in the High Desert, as listed in Table 3.2-2, could rent the facility.

TABLE 3.2-2: COMMUNITY USERS

Season	Facility Users					Hours
August – December	Football Club (main user)		Soccer Club (during off season)		Track Club	5 PM – 9 PM
January – June	Soccer Club (main user)		Football Club (during off season)		Track Club	5 PM – 9 PM
June – August	Summer Sports Camps					9 AM – 3 PM
June – August	Football	Soccer	Baseball	Softball	Track	3 PM – 9 PM

3.3 Construction Schedule and Activities

Construction is anticipated to begin in 2026 or 2027. Construction would be completed in one phase and take approximately 12 months.

4.0 ENVIRONMENTAL SUMMARY AND DETERMINATION

4.1 Initial Study Checklist

Project Title:	Challenger School of Sports and Fitness Track and Field
Lead Agency Name and Address:	Victor Elementary School District 12219 2nd Avenue Victorville, CA 92395
Contact Person and Phone Number:	Joe Pont Director of Facilities, Transportation & Maintenance (760) 245-1691 jpont@vesd.net
Project Location:	Challenger School of Sports and Fitness 14777 Hopland Street Victorville, CA 92394 San Bernardino County
Project Sponsor's Name and Address:	Victor Elementary School District Facilities Department 14875 South Mojave Drive Victorville, CA 92395

Description of Project: The District proposes a track and field at the Challenger School of Sports and Fitness (Challenger School). The proposed facility would be oriented north-south and constructed south of the existing school building within the western portion of the school campus and on an undeveloped, District-owned lot south of the school. The new facility would include a lighted synthetic track and field with home and visitor bleacher seating for 2,000 spectators. Appurtenant improvements would be installed, including a 1,440-square-foot building with restroom facilities and concessions. A new parking lot would be developed south of the existing parking lot along the eastern perimeter of the vacant lot. The proposed track and field facility would serve the existing physical education and sports programs at the school. When not used by the school, the new facility would be available for other District-sponsored events and by the Victorville community, pursuant to the Civic Center Act and District policies. See Section 3 for additional project characteristics.

Existing and Surrounding Land Uses and Setting: The project would be developed in the southwestern area of the existing Challenger School campus and the lot south of the school (project site). The project site includes desert landscaping and a portion of the grass sports field of the campus and disturbed desert vegetation in the vacant parcel. The project site is surrounded by existing school facilities to the north and undeveloped natural vegetation to the west, south, and east. Hopland Street and Cahuenga Road are adjacent to Challenger School on the north and east, respectively, beyond which are rural residential uses. See Section 2 for additional information concerning the existing conditions of the project area.

General Plan Land Use Designation: Low Density Residential

Zoning District: R-1, Single Family Residential

Other Public Agencies Whose Approval is Required:

- California Department of Fish and Wildlife (Incidental Take Permit)
- Division of the State Architecture

Have California Native American tribes traditionally and culturally affiliated with the project are requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No, the District has not received requests for consultation from California Native American tribes, pursuant to California Assembly Bill (AB) 52.

4.2 Environmental Factors Potentially Affected

This Initial Study evaluates the environmental effects of the project, using the environmental checklist provided in Appendix G of the 2024 CEQA Guidelines. The environmental factors checked below would be potentially affected by the project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the evaluation in this document.

☒ NONE

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

4.3 Determination

On the basis of the evaluation provided herein this Initial Study:

☐ The District finds that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☒ The District finds 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.

☐ The District finds that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ The District finds 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.

☐ The District finds 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.

Ced Pace — 1/16/2026

Signature **Date**

5.0 ENVIRONMENTAL ANALYSIS

This section evaluates the environmental impacts of the project, using the environmental checklist in Appendix G of the CEQA Guidelines. Each environmental checklist response accounts for 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. Each response includes a summary of the existing conditions at the regional, subregional, and local levels, as appropriate, and identifies applicable plans and technical information for the particular issue area. A detailed analysis is provided, and the level of significance for each checklist. Four levels of significance are evaluated in this Initial Study:

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

- **Less Than Significant Impact**. The project would have the potential for impacting the environment; however, the impact would not exceed the applicable significance thresholds.

- **Less Than Significant Impact With Mitigation Incorporated**. The project would have the potential to generate impacts which may be considered a significant effect on the environment, although measures or changes to the development's physical or operational characteristics would reduce the impacts to levels that are less than significant.

- **Potentially Significant Impact**. The project would have impacts which are considered significant, and additional analysis is required to identify measures that could reduce these impacts to less than significant levels.

5.1 Aesthetics

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning 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?	☐	☐	☒	☐

Discussion

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. According to the City's General Plan Environmental Impact Report (EIR), there are no designated scenic vistas in the City.[3] However, areas of high visual sensitivity include the following: the Mojave River, located approximately 2.4 miles northeast and east of the project site; and the rocky bluffs of the Mojave Narrows and the Mojave Narrows Regional Park, located approximately 3.8 miles southeast. Due to intervening terrain and topography, views of these areas of visual interest are not afforded from the project site. The proposed improvements would be constructed in the southwest portion of the project site, behind the existing school building from Hopland Street and on an area that is lower in elevation than the adjacent western property. As the proposed improvements would be far away from high visual sensitivity areas, compatible with the existing school use, and away from available public views along Hopland Street, project implementation would not result in an adverse effect on a scenic vista. Therefore, impacts would be less than significant.

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

No Impact. Scenic highways are a unique component of the regional circulation system as they traverse areas of scenic or aesthetic value. According to the California Department of Transportation's State Scenic

[3] City of Victorville, *Program Environmental Impact Report, City of Victorville General Plan Update*, November 2022.

Highway System Map, the closest eligible scenic highways to the project site are State Route 138 and State Route 247, located approximately 16 miles south and east of the project site, respectively.[4] Due to distance, the project would not be visible from State Route 138 and State Route 247. As such, the project would not substantially damage scenic resources within a State Scenic Highway, and no impact would occur.

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

Less Than Significant Impact. CEQA defines an "urbanized area" as an incorporated city that has a population of at least 100,000 persons or a population of less than 100,000 persons and where not more than two contiguous incorporated cities combined equals at least 100,000 persons.[5] The project site is within the City of Victorville, which is an incorporated city with a population of 138,202.[6] Therefore, the project is located in an urbanized area, and the first question of this threshold does not apply to the project because it is directed at non-urbanized areas.

The project would not conflict with any regulations governing scenic quality, which is generally defined as the impression a viewer retains after driving through, walking through, or flying over an area. The project would comply with all applicable state codes, including the CBC and related sections of CALGreen and the Energy Code that govern scenic quality and light pollution reduction requirements. Additionally, project plans would be plan-checked by the Division of the State Architect to ensure all project components comply with state law and regulations in compliance with the Field Act. The Field Act grants authority to the Division of State Architecture to provide design and construction oversight for K–12 schools, community colleges, and various other state-owned and state-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes.[7]

The Victorville Land Use Element includes a goal to create an aesthetically pleasing community. The goal is supported by two objectives: LU Objective N - Promote a distinctive identity and image for Victorville with high quality design of the built environment to increase its desirability as an attractive place to live, work and play, and LU Objective O - Protect existing development from intrusion by new incompatible land uses. The project would be developed at an existing school that serves the surrounding suburban residential community. The proposed improvements would include hooded and shielded field lights with louvers to minimize spill light, glare, and sky glow. The proposed improvements would be located away from existing residences and public roadways, designed to be compatible with the existing school and surrounding community, and consistent with the school's sports theme. The project would enhance the

[4] California Department of Transportation, California State Scenic Highway System Map, accessed August 26, 2025, https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.
[5] Public Resources Code Section 21071.
[6] California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024, accessed November 2024, https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025.
[7] Division of the State Architect, *About Us*, https://www.dgs.ca.gov/dsa/About, accessed December 5, 2025.

existing school campus facilities and encourage future residential development to be designed around this community facility. Accordingly, the project would be consistent with the Victorville development standards, including for the R-1 zoning district.

While the project would be consistent with Victorville's zoning and regulations governing scenic quality, the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable.[8] Therefore, the project would not conflict with zoning or regulations designed to protect scenic quality. Impacts would be less than significant.

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

Less Than Significant Impact.

Construction

Project construction could involve temporary glare impacts as a result of construction equipment and materials. Project construction would be limited to the daytime hours, and nighttime lighting would be limited to temporary security lighting during construction. Although there may be some material on construction equipment that produces limited and minimal amounts of glare, such as side mirrors or unpainted metal surfaces, any potential glare would be short-term in duration. Therefore, no adverse light or glare impacts to adjacent properties are anticipated to result from temporary construction activities.

Operation

The project would include new sources of light, including a scoreboard, nighttime field lighting, and security lighting in the parking lot, which may have the potential to cause light and glare impacts. Potential impacts relative to light and glare for the proposed scoreboard, nighttime field lighting, and security lighting are discussed below.

- The scoreboard would be located north of the track and field and face southward. The scoreboard would have LED video displays, which are typical of scoreboards used by public schools, and that can be adjusted for brightness. As the scoreboard would be operated only during events and turned off shortly afterwards, potential light and glare impacts would be limited and considered less than significant.

- The proposed field lights would be designed to meet lighting standards established by the California Interscholastic Federation. Although the new lights would increase illumination of the project site, each fixture would include a hood and side shields with reflectors that aim light downward to light only the intended areas and minimize light trespass. Therefore, light and glare from the field lights would be less than significant.

[8] California Government Code Section 53094 et seq.

- Security lighting would be installed at the new parking lot. The proposed light poles would be similar to those at the existing lots and provide the same level of illumination as the existing poles. The light fixtures would include a hood and be aimed downward. Accordingly, light and glare impacts from the security lights would be less than significant.

The new sources of light would increase the amount of light and glare in the area. However, they would be consistent with the ambient light levels from nearby sources. Therefore, impacts would be less than significant.

5.2 Agriculture and Forestry Resources

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

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

No Impact. The project site is classified as Urban and Built Up Land according to the California Department of Conservation Farmland Finder.[9] As such, project implementation would not convert existing farmland to a non-agricultural use. No impact would occur.

[9] California Department of Conservation, Division of Land Resource Protection, California Important Farmland Finder, accessed March 14, 2025, https://maps.conservation.ca.gov/DLRP/CIFF/.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact The zoning for the project site is R-1, Single Family Residential.[10] There is no Williamson Act contract applicable to the project site.[11] Therefore, project implementation would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The zoning for the project site is R-1, Single Family Residential. The project site is not zoned for forestland, timberland, or timberland production. Thus, project implementation would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland production. No impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer also to Response 5.2(c). The project site includes an area of a developed school campus and desert habitat with no forestland. Therefore, project implementation would not result in the loss of forestland or conversion of forest land to non-forest use. No impact would occur.

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

No Impact. Refer also to Responses 5.2(a) through 5.2(d). The project site includes a portion of an existing school and desert habitat. Project implementation would not result in conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. This site has no farmland or forestland to be affected. No impact would occur.

[10] City of Victorville, 2022, 2045 General Plan Update Land Use Element, 638237235345270000.
[11] Department of Conservation, Division of Land Resource Protection, California Williamson Act Enrollment Finder, accessed March 14, 2025, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html.

5.3 Air Quality

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Discussion

The analysis and findings throughout this section are based upon *the Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis for the Challenger School of Sports and Fitness Sports Complex Project in Victorville*, *San Bernardino, California* (Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis), prepared by Vista International, dated March 28, 2025; refer to Appendix A.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The proposed project is located within the Mojave District Air Basin (MDAB or Basin), which is governed by the Mojave Desert Air Quality Management District (MDAQMD). A project is consistent with the MDAQMD's CEQA and Federal Conformity Guidelines (MDAQMD Guidelines) when it is consistent with the goals, objectives, and assumptions set forth in the document that are designed to achieve federal and state air quality standards. According to the MDAQMD Guidelines, a project is significant if it triggers or exceeds the most appropriate evaluation criteria. In general, the emissions comparison (criteria number 1) is significant if a project development:

1) Generates total emissions (direct and indirect) in excess of the thresholds given in Table 5.3-1, *MDAQMD Significant Emissions Thresholds*;

2) Generates a violation of any ambient air quality standard when added to the local background;

3) Does not conform with the applicable attainment or maintenance plan(s);[12] and/or

4) Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.

TABLE 5.3-1: MDAQMD SIGNIFICANT EMISSIONS THRESHOLDS

Pollutant	Annual Threshold (tons)	Daily Threshold (pounds)
Greenhouse Gases (CO_2e)	100,000	548,000
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO_X)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO_X)	25	137
Particulate Matter (PM_{10})	15	82
Particulate Matter ($PM_{2.5}$)	12	65
Hydrogen Sulfide (H_2S)	10	54
Lead (Pb)	0.6	3

Source: Appendix A, *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis*

Criteria:

1. *Would the project generate total emissions (direct and indirect) in excess of the thresholds given in Table 5.3-1, MDAQMD Significant Emissions Thresholds?*

The emissions associated with the proposed project consist of construction and operational emissions. Construction emissions are temporary and include emissions of criteria pollutants and greenhouse gases (GHG) from construction activities during site preparation, grading, building construction, paving, and the application of architectural coatings. Operational emissions consist of area sources (e.g., reapplying architectural coatings, consumer products, and landscaping equipment), energy use (e.g., electricity and natural gas), mobile sources (e.g., commuting), solid waste disposal, and water and wastewater use (e.g., supplying and treating water and wastewater). The project is not considered one of the project types that the MDAQMD Guidelines requires to be evaluated for potentially exposing sensitive receptors to substantial pollutant concentrations.

Construction Emissions

Construction activities for the proposed project are anticipated to begin in March 2026 and would take approximately one year to complete. Construction activities for the proposed project are anticipated to include site preparation and grading of approximately 8.1 acres of the project site, building construction of the track and field facility, paving of the parking lot and hardscape areas, and application of

[12] A project is deemed to not exceed this threshold, and hence not be significant, if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments and similar land use plan changes that do not increase dwelling unit density, do not increase vehicle trips, and do not increase vehicle miles traveled are also deemed to not exceed this threshold.

architectural coatings. As shown in Table 5.3-2, *Construction-Relation Air Pollutant Emissions*, the emissions generated during project construction would not exceed MDAQMD thresholds. Therefore, impacts relative to construction-related emissions would be less than significant.

TABLE 5.3-2. CONSTRUCTION-RELATED AIR POLLUTANT EMISSIONS

	Pollutant Emissions[1] (tons per year)					
Construction Year	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
2026	0.13	1.20	1.53	<0.01	0.10	0.07
2027	0.10	0.32	0.45	<0.01	0.02	0.01
MDAQMD Thresholds	**25**	**25**	**100**	**25**	**15**	**12**
Exceeds Thresholds?	No	No	No	No	No	No

Notes:
[1] Construction based on adherence to fugitive dust suppression requirements from MDAQMD Rule 403.2.
Calculated from CalEEMod Version 2022.1.
Source: Appendix A, Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis

Operational Emissions

Operational emissions for the proposed project are shown in Table 5.3-3, Operations-Related Air Pollutant Emissions. As shown in Table 5.3-3, the emissions generated during operation of the project would not exceed MDAQMD thresholds. As such, impacts relative to operational emissions would be less than significant.

TABLE 5.3-3. OPERATIONS-RELATED AIR POLLUTANT EMISSIONS

	Pollutant Emissions (tons per year)					
Emissions Source	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Mobile Sources[1]	0.07	0.07	0.49	<0.01	0.11	0.03
Area Sources[2]	0.07	<0.01	0.05	<0.01	<0.01	<0.01
Energy Sources[3]	<0.01	0.03	0.02	<0.01	<0.01	<0.01
Total Emissions	**0.14**	**0.10**	**0.56**	**<0.01**	**0.12**	**0.03**
MDAQMD Thresholds	**25**	**25**	**100**	**25**	**15**	**12**
Exceeds Thresholds?	No	No	No	No	No	No

Notes:
[1] Mobile sources consist of emissions from vehicles and road dust.
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consist of emissions from natural gas usage.
Calculated from CalEEMod Version 2022.1.
Source: Appendix A, *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis*.

2. *Would the project generate a violation of any ambient air quality standard when added to the local background?*

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the MDAB as well as from air pollutants that travel from the coastal areas to the MDAB. The MDAQMD operates an extensive monitoring network throughout the County that continuously monitors ambient levels of criteria pollutants in compliance with

federal monitoring regulations. The nearest air monitoring station to the project site is the Victorville Monitoring Station, which is located approximately 2.2 miles south of the site at 14306 Park Avenue, Victorville. Table 5.3-4, *Local Area Air Quality Monitoring Summary*, presents the most recent available three years of air quality data for the Victorville Monitoring Station.

TABLE 5.3-4: LOCAL AREA AIR QUALITY MONITORING SUMMARY

Pollutant (Standard)	Year		
	2021	**2022**	**2023**
Ozone:			
Maximum 1-Hour Concentration (ppm)	0.112	0.100	0.097
Days > CAAQS (0.09 ppm)	**8**	**3**	**2**
Maximum 8-Hour Concentration (ppm)	0.098	0.090	0.088
Days > NAAQS (0.070 ppm)	**34**	**44**	**32**
Days > CAAQs (0.070 ppm)	**35**	**49**	**32**
Nitrogen Dioxide:			
Maximum 1-Hour Concentration (ppb)	56.6	53.5	60.1
Days > NAAQS (100 ppb)	0	0	0
Inhalable Particulates (PM10):			
Maximum 24-Hour National Measurement (ug/m^3)	591.6	372.1	160.4
Days > NAAQS (150 ug/m^3)	**1**	**2**	**1**
Days > CAAQS (50 ug/m^3)	ND	ND	ND
Annual Arithmetic Mean (AAM) (ug/m^3)	33.9	33.6	28.4
Annual > NAAQS (50 ug/m^3)	No	No	No
Annual > CAAQS (20 ug/m^3)	**Yes**	**Yes**	**Yes**
Ultra-Fine Particulates (PM2.5):			
Maximum 24-Hour National Measurement (ug/m^3)	87.1	24.6	25.6
Days > NAAQS (35 ug/m^3)	**1**	0	0
Annual Arithmetic Mean (AAM) (ug/m^3)	10.3	9.0	7.9
Annual > NAAQS and CAAQS (12 ug/m^3)	No	No	No

Notes: Exceedances are listed in **bold.**
CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million; ppb = parts per billion; ND = no data available.
Source: Appendix A, Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis

Areas with air quality that exceed Federal and State standards are designated as non-attainment for the respective pollutants. As shown in Table 5.3-4, the project area is designated as a nonattainment area for Federal ozone (8-hour), PM_{10}, and $PM_{2.5}$ standards and nonattainment for State ozone (1-hour) standards.

As indicated under Criterion 1 and as substantiated by Appendix A, the proposed project would result in emissions levels below the MDAQMD thresholds. Therefore, the proposed project would not have the

potential to cause or affect a violation of the ambient air quality standards when added to the local background. Impacts would be less than significant in this regard.

3. *Does the project conform with the applicable attainment or maintenance plan(s)?*

According to the MDAQMD Guidelines, a non-conforming project conflicts with or delays implementation of any applicable attainment or maintenance plan, whereas a conforming project complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. The City's General Plan defines the long-range land use assumptions that are represented in the air quality management plans. The project site is currently designated as Low Density Residential in the General Plan and is zoned Low Density Residential. The proposed project would consist of the development of a track and field facility at Challenger School. Sports facilities and school uses are an allowed use in the Low Density Residential Land Use Designation and zoning. Therefore, the proposed project would be consistent with the types, intensity, and patterns of land use envisioned for the site and thus would conform with the applicable attainment or maintenance plans for the project area. Impacts would be less than significant.

4. *Would the project expose sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1?*

The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The MDAQMD Guidelines details that sensitive receptor land uses consist of residences, schools, daycare centers, playgrounds, and medical facilities. The nearest sensitive receptors are single-family homes on the east side of Carmelia Drive, approximately 360 feet from the project site. There are also single-family homes on the north side of Hopland Street, approximately 600 feet from the project site.

According to the MDAQMD Guidelines, if one of the following project types is proposed for a site within the specified distance to an existing or planned (zoned) sensitive receptor land use, it must be evaluated to determine if it exposes sensitive receptors to substantial pollutant concentrations:

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

The proposed project is not included in the land uses listed above. Therefore, the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

In conclusion, the determination of MDAQMD Guidelines consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. As discussed above, the proposed project's long-term influence would also be consistent with the goals and policies of

the MDAQMD Guidelines and is thus considered consistent with the MDAQMD Guidelines. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan. A less than significant impact would occur.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. As indicated in Table 5.3-4, the project area is designated as a nonattainment area for Federal ozone (8-hour), PM_{10}, and $PM_{2.5}$ standards and nonattainment for State ozone (1-hour) standards. However, the estimated emissions of criteria pollutants and GHGs for each year of construction and the total operational emissions are well below the applicable MDAQMD Significant Emissions Thresholds. Therefore, the project would not 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. Impacts would be less than significant in this regard.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed previously, the project is not considered one of the project types that the MDAQMD Guidelines require to be evaluated for potentially exposing sensitive receptors to substantial pollutant concentrations. Accordingly, impacts would be less than significant.

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

Less Than Significant Impact. Individual responses to odors are highly variable and can result in a multitude of effects. Generally, response to an odor may be influenced by a variety of factors including frequency, duration, offensiveness, location, and sensory perception.

Construction-Related Odor Impacts

Potential odor sources during construction activities include the application of coatings (e.g., asphalt pavement, paints, and solvents) and emissions from diesel equipment. Odor impacts from construction would be minimized by standard construction requirements that limit the time of day when construction may occur; MDAQMD Rule 442, which limits VOC content in solvents; Rule 1103, which limits VOC content in asphalt; and Rule 1113, which limits the VOC content in paints and solvents. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The proposed project would consist of development and operation of a track and field. Potential sources that may emit odors during the ongoing project operations would primarily occur from the trash storage areas. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain and limit air circulation would be required for the trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with MDAQMD's Rule 402, City trash storage regulations, a less than significant impact related to odors would occur during the ongoing operations of the proposed project. Therefore, a less than significant odor impact would occur and no mitigation would be required.

5.4 Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game 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 Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

The analysis and findings throughout this section are based upon the following:

- *Biological Resources Assessment for the Challenger Elementary School Track & Field Project in the City of Victorville, San Bernardino County, California* (BRA), prepared by Michael Baker International, dated April 4, 2025; refer to Appendix B1, and

- *2025 Focused Burrowing Owl Survey Report for the Challenger Elementary School Track & Field Project in the City of Victorville, San Bernardino County, California*, prepared by Michael Baker International, dated August 15, 2025; refer to Appendix B2.

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

Less Than Significant Impact With Mitigation Incorporated. The BRA (Appendix B1) prepared for the project entailed a literature review and field survey. Prior to conducting the field survey, Michael Baker International conducted a thorough literature review and records search to characterize existing site conditions and assess the potential for special-status biological resources. The literature review include a query of the California Natural Diversity Database (CNDDB, CNDDB 2024) and California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California (CNPS 2024) to obtain a list of special-status plant and wildlife species occurrence records within the USGS *Baldy Mesa, Hesperia, Apple Valley South, Apple Valley North, Turtle Valley, Helendale, Victorville, Victorville NW, and Adelanto, California* 7.5-minute quadrangle maps. Other sources of information about the project site and surrounding area include the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online database, the USFWS Critical Habitat for Threatened & Endangered Species mapping tool (USFWS 2024b), the US Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA NRCS 2024), and the USFWS National Wetlands Inventory (USFWS 2024c).

On October 10, 2024, Michael Baker International biologist conducted a general biological resources survey and habitat assessment to document existing conditions and conduct a habitat assessment for special-status plant and wildlife species and sensitive natural communities, and to determine the presence of aquatic resources within the project site.

The results of the literature review and field survey are discussed below.

Sensitive Natural Communities

No sensitive natural communities were identified during the literature review or field survey. Accordingly, implementation of the proposed project would have no impact on sensitive natural communities.

Special-Status Plant Species

The literature review identified 23 special-status plant species with the potential to occur at the project site. One special-status plant species was observed on site during the October 2024 survey: western Joshua tree (*Yucca brevifolia*; State Candidate Threatened). After a review of specific habitat preferences, known distributions, and elevation ranges, all other special-status plant species either have a low potential or are not expected to occur due to a lack of suitable habitat and lack of recent extant occurrences near the survey area. Impacts to the western Joshua tree are not expected to occur as no individuals occur within the project construction area.

Special-Status Wildlife Species

The literature review identified 33 special-status wildlife species with the potential to occur at the project site. Two special-status wildlife species were observed during the field survey: burrowing owl (*Athene cunicularia*; State Candidate Threatened/Endangered) and loggerhead shrike (*Lanius ludovicianus*; CDFW Species of Special Concern). Based on the general habitat assessment, the project site is expected to be used by burrowing owl during the winter, and there is high potential for this species to occupy the project site during the breeding season. All other special-status species are not expected to occur within the project site following a review of specific habitat preferences, known distributions, and elevation ranges.

A focused burrowing owl (BUOW) survey was conducted for the proposed project; refer to Appendix B2. As identified in Appendix B2, a total of six burrowing owls, consisting of two adult pairs and two juveniles, were observed during the 2025 breeding season burrowing owl focused surveys. The population of burrowing owls associated with the survey area is mainly restricted to the central and southern portions of the project site due to the presence of open foraging habitat and suitable burrows. Impacts to burrowing owls would be minimized with implementation of Mitigation Measure BIO-1, which requires coordination with CDFW and USFWS prior to vegetation- or ground-disturbing activities. If impacts to occupied burrowing owl habitat or burrow(s) or burrowing owl individuals, nests, or eggs cannot be avoided, appropriate NCCP (Fish and Game Code section 2835) or CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081 (b)) should be obtained from CDFW prior to project implementation. Further, to the presence of occupied burrows within the project footprint, a burrowing owl mitigation and monitoring plan would be required in compliance with Mitigation Measure BIO-2. Additionally, in compliance with Mitigation Measure BIO-3, the District would be required to replace burrowing owl habitat at ratio of 1:1 through payment into the Fremont Yermo Conservation Bank (pending CDFW approval) or other approved mitigation bank. Implementation of Mitigation Measure BIO-1 through BIO-3 would reduce impacts to sensitive wildlife species to less than significant.

BIO-1 A qualified biologist will conduct a preconstruction survey for burrowing owl 14 days prior to initiation of ground-disturbing activities. If the species is present, measures in the Burrowing Owl Mitigation and Monitoring Plan (MMP) will be implemented. Additional preconstruction surveys may be necessary within three days prior to construction to verify the species has not recolonized.

BIO-2 A Burrowing Owl MMP will be prepared for the burrowing owl. This plan will outline the actions required before the start of construction activities, including preconstruction surveys, timing of activities, avoidance buffer zones, monitoring requirements, relocation, and any other mitigation measures based on coordination and guidance from the CDFW. The Burrowing Owl MMP must be approved by the CDFW before any relocation or construction activities commence and will incorporate any conditions required in the incidental take permit.

Additional measures that may be required by the CDFW and would be incorporated into the Burrowing Owl MMP include, but are not limited to:

- Avoidance of construction during the nesting period (February 1–August 31).

- No impacts on active burrows during the non-breeding season and no direct destruction of burrows would occur until it is confirmed that the burrowing owls are no longer utilizing the burrow.

- Development and execution of a Worker Environmental Awareness training.

- Monitoring by a qualified biologist.

BIO-3 The District will replace burrowing owl habitat at ratio of 1:1 through payment into the Fremont Yermo Conservation Bank (pending CDFW approval) or other approved mitigation bank.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. No riparian habitat or sensitive natural communities are present within the project site. Therefore, the project would not have a significant impact on sensitive natural communities.

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

No Impact. As identified in Appendix B, the project site does not contain any state or federally protected wetlands. Therefore, there would be no impact to state or federally protected wetlands.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact With Mitigation Incorporated. The project site consists of mostly undeveloped land adjacent to an existing area of development. The surrounding land uses consist of a mix of developed and undeveloped lands and could potentially support travel routes or wildlife connectivity within the area. Because the project site is adjacent to developed land and consists of a small portion of the overall undeveloped land in the area, it does not serve as a habitat linkage or wildlife corridor. There would be no impact to native wildlife movement or wildlife corridors.

Nesting birds are protected pursuant to the federal Migratory Bird Treaty Act of 1918 and the California Fish and Game Code.[13] To maintain compliance with the Migratory Bird Treaty Act and California Fish and

[13] Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the California Fish and Game Code or any regulation made pursuant thereto; Section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey); and Section 3513 makes it unlawful to take or possess any migratory non-game bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act, as amended (16 U.S.C. § 703 et seq.).

Game Code, clearance surveys are typically required during the breeding season (generally February 1 to August 31 but as early as January 1 for raptors) prior to any ground disturbance or vegetation removal activities to avoid direct and indirect impacts to active bird nests and/or nesting birds. Consequently, if an active bird nest is destroyed or if project activities result in indirect impacts to nesting birds (e.g., nest abandonment, loss of reproductive effort), it is considered "take" and is potentially punishable by fines and/or imprisonment. Although no nests were observed during the field survey, the vegetation within and adjacent to the project site provides suitable nesting opportunities for a variety of bird species, and the removal of vegetation supporting an active nest is considered a potentially significant impact. Mitigation Measure BIO-4, which requires pre-construction surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present on the project site, would reduce this impact to a less than significant level.

BIO-4 Within 30 days prior to ground-disturbing activities associated with project construction that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August in the project region, or as determined by a qualified biologist), the applicant shall have weekly surveys conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present on the project site. The surveys shall continue on a weekly basis, with the last survey being conducted no more than seven days prior to initiation of disturbance work. If ground-disturbing activities are delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities.

If active nests are found, clearing and construction within 300 feet of the nest (500 feet for raptors) shall be postponed or halted, at the discretion of the qualified biologist in consultation with the California Department of Fish and Wildlife (CDFW), until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. Joshua trees are protected by Chapter 13.33.040 of the Victorville Municipal Code, which prohibits the destruction or removal of Joshua trees without written consent from the Director of Parks and Recreation. As identified in Appendix B1, the western Joshua tree was documented on the project site. However, impacts to the western Joshua tree are not expected to occur as no individuals occur within the project construction area. Accordingly, the project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would occur in this regard.

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

No Impact. The project site is not within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Accordingly, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur in this regard.

5.5 Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Discussion

The analysis and findings throughout this section are based upon the *Cultural Resources Assessment for the Challenger School of Sports and Fitness Sports Complex Project in Victorville*, *San Bernardino, California* (Cultural Resources Assessment), prepared by Michael Baker International, dated December 11, 2024; refer to Appendix C.

The Cultural Resources Assessment entailed a South Central Coastal Information Center (SCCIC) records search, Native American Heritage Commission (NAHC) Sacred Lands File search, literature and historical map review, archaeological field survey, and buried archaeological site sensitivity analysis to determine if the project area contains historical resources. One cultural resource has been recorded within the 0.5-mile search radius, as shown in Table 5.1-1, *Previously Recorded Cultural Resources within 0.5 Miles*. The site, CA-SBR-012007, was recorded by R. Cerreto of Analytic Archaeology in 2004 as consisting of a sparse lithic scatter consisting of five pieces of chalcedony and jasper debitage.

TABLE 5.5-1: PREVIOUSLY RECORDED CULTURAL RESOURCES WITHIN 0.5 MILES

Primary Number	Trinomial	Year	Recorder and Firm	Description	Within Project Area
P-36-012007	CA-SBR-012007	2004	R. Cerreto – Analytic Archaeology	AP2. Lithic scatter	Outside

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

No Impact. As identified in Appendix C, the SCCIC records search, literature and historical map review, and field survey did not identify any historic resources, as defined by CEQA Section 15064.5(a), within the project area. Accordingly, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. No impact would occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact With Mitigation Incorporated. An archaeological survey of the project area was conducted on October 10, 2024, as part of the Cultural Resources Assessment. The survey focused on the undeveloped areas of the project site, as approximately half of the project area has been developed for Challenger School and associated parking lot. Ground visibility of the project site ranged from 70-75 percent along the western perimeter to a high of 95 percent on the school grounds. There were no precontact or historic archaeological resources identified during the field survey.

Sensitivity for buried archaeological resources within the project area is considered low to moderate. The records search from the SCCIC did not identify any previously recorded archaeological sites within the project area; however, the records did identify one archaeological site within 0.5-mile radius surrounding it. Additionally, the NAHC Sacred Lands File search returned positive results.

The project area has experienced disturbance associated with past construction. However, intact buried archaeological deposits may remain at depths below previous disturbances or in other areas around the perimeter that have not previously been disturbed. Given that archaeological site sensitivity is low to moderate and the amount of previous disturbance in the project area, archaeological monitoring during all ground disturbances is not recommended.

However, there is still potential for disturbing previously unknown archaeological resources during excavation into native soil, which may result in a significant impact to previously unidentified archaeological resources. Therefore, in conformance with Mitigation Measure CUL-1, if previously unknown archaeological materials were encountered during project-related ground-disturbing activities, work would be halted in the immediate area until a qualified archeologist evaluated the find and recommended appropriate treatment. The archaeologist may evaluate the find in accordance with federal, state, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify avoidance or other measures as appropriate. Conformance with such federal, state, and local guidelines would minimize impacts to potential archaeological resources to less than significant. Accordingly, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 and impacts would be less than significant with mitigation incorporated.

CUL-1 In the event that any subsurface cultural resources are encountered during earth-moving activities, work shall be halted in the vicinity of the discovery until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738), evaluates the findings and makes recommendations. The resource shall be evaluated for significance, and tribal consultation shall be conducted in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials shall be determined in consultation with the affiliated tribe(s), where relevant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The project site is not located on or near to an existing known cemetery. Human remains are not anticipated to be encountered. However, there is always the possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. In conformance with the California Health and Safety Code Sections 7050.5 through 7055, if human remains were found, those remains would require proper treatment in accordance with applicable laws. California Health and Safety Code Sections 7050.5 through 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by state law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County coroner, notification of the NAHC, and consultation with the individual identified by the NAHC to be the most likely descendant. If human remains are found during excavation, excavation must cease in the vicinity of the find and any area that is reasonably suspected to overlie adjacent remains until the County coroner has been notified, the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains would be less than significant.

5.6 Energy

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Discussion

To evaluate the project's potential to result in impacts regarding energy, a project-specific *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis for the Challenger School of Sports and Fitness Sports Complex Project in Victorville*, *San Bernardino, California* (Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis) was prepared by Vista International, dated March 28, 2025; refer to Appendix A of this IS/MND.

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The proposed project would utilize energy resources during construction and operation. Energy resources that would be potentially utilized include electricity, natural gas, and petroleum-based fuel supplies and distribution systems. This analysis includes a discussion of the potential energy impacts of the proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. A general definition of each of these energy resources is provided below.

Construction Energy

The proposed project would consume energy resources during construction in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities);

2. Electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and

3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

During construction, the proposed project would consume electricity to construct new structures and infrastructure. Electricity would be supplied to the project site by Southern California Edison (SCE) and would be obtained from the existing electrical lines in the vicinity of the project site. The use of electricity from existing power lines rather than temporary diesel or gasoline-powered generators would minimize impacts on energy use. Electricity consumed would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other activities necessitating electrical power. Such electricity demand would be temporary and nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Since SCE already provides power to the project site, it is anticipated that only nominal improvements would be required to SCE distribution lines and equipment with development of the proposed project. Compliance with the City's guidelines and requirements would ensure that the proposed project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction of the project. Construction of the project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Natural Gas

Construction of the proposed project typically would not involve the consumption of natural gas. Natural gas would not be supplied to support construction activities; thus there would be no demand generated by construction. Since Southwest Gas Corp. already provides natural gas to the project site, construction-related activities would be limited to installation of new natural gas connections within the project site. Development of the proposed project would not require extensive natural gas infrastructure improvements to serve the project site. Construction-related energy usage impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, the District would notify and coordinate with Southwest Gas Corp. to identify the locations and depth of all existing gas lines and avoid disruption of gas service. Therefore, construction-related impacts to natural gas supply and infrastructure would be less than significant.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be used by off-road equipment operating on the project site, on-road automobiles transporting workers to and from the project site, and on-road trucks transporting equipment and supplies to the project site.

The off-road construction equipment fuel usage was calculated through the off-road equipment assumptions and fuel use assumptions shown in Section 8.2 of Appendix A, which found that construction of the proposed project would consume 1,414 gallons of gasoline and 33,355 gallons of diesel fuel. This

equates to 0.0002 percent of the gasoline and 0.01 percent of the diesel used annually in San Bernardino County. As such, the construction-related petroleum use would be nominal, when compared to current countywide petroleum usage rates.

Construction activities associated with the proposed project would be required to adhere to all state and MDAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the proposed project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the proposed project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete; thus it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy

The ongoing operation of the proposed project would require the use of energy resources for multiple purposes including but not limited to heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment, and vehicle trips.

Operations-Related Electricity

Operation of the proposed project would result in consumption of electricity at the project site. The proposed project would consume 120,938 kilowatt-hours per year of electricity as shown in Section 8.2 of Appendix A. This equates to 0.0007 percent of the electricity consumed annually in San Bernardino County. As such, the operations-related electricity use would be nominal, when compared to current electricity usage rates in the County.

It should be noted that the proposed project would comply with all federal, state, and City requirements related to the consumption of electricity, including CCR Title 24, Part 6, Building Energy Efficiency Standards, and CCR Title 24, Part 11, the CALGreen Code. The Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structure, including enhanced insulation, use of energy-efficient lighting and appliances, and water and space heating systems. Therefore, it is anticipated that the proposed project will be designed and built to minimize electricity use and that existing and planned electricity capacity and supplies would be sufficient to support the proposed project's electricity demand. Thus, the project's operation would not result in the wasteful or inefficient use of electricity and no mitigation measures would be required.

Operations-Related Natural Gas

Operation of the proposed project would result in increased consumption of natural gas at the project site. As detailed in Section 8.3 of Appendix A, the proposed project would consume 5,439 therms per year of natural gas. This equates to 0.0009 percent of the natural gas consumed annually in San Bernardino County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County.

It should be noted that the proposed project would comply with all federal, state, and City requirements related to the consumption of natural gas, including CCR Title 24, Part 6, Building Energy Efficiency Standards and CCR Title 24, Part 11, the CALGreen Code. The Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed project, such as enhanced insulation and the use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated that the proposed project will be designed and built to minimize natural gas use and that existing and planned natural gas capacity and supplies would be sufficient to support the proposed project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site. As detailed in Section 8.2 of Appendix A, the proposed project would consume 12,216 gallons of gasoline per year from vehicle travel. This equates to 0.001 percent of the gasoline consumed annually in San Bernardino County. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates

It should be noted that the proposed project would comply with all federal, state, and City requirements related to the consumption of transportation energy, including CCR Title 24, Part 11, the CALGreen Code, which requires the installation of electric vehicle charging systems. Therefore, it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the proposed project's demand. Thus, impacts with regard to transportation energy supply and infrastructure capacity would be less than significant.

The proposed project would comply with regulatory compliance measures outlined by the state and City related to energy (see Section 5.0 of Appendix A). Additionally, the proposed project would be constructed in accordance with all applicable City building and fire codes. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operations. Environmental impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plan for the proposed project is the *City of Victorville General Plan 2030*, adopted September 24, 2008. The proposed project's consistency with the energy objective and policies from the Resource Element of the General Plan are shown in Table 5.6-1. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

TABLE 5.6-1: PROPOSED PROJECT COMPLIANCE WITH THE GENERAL PLAN ENERGY POLICIES

General Plan Policy	Proposed Project Implementation Actions
Objective 7.1 Promote alternative energy sources.	
Policy 7.1.1: Support development of solar, hybrid, wind and other alternative energy generation plants.	**Consistent.** The project will be required to meet the most current Title 24, Part 11 standards that require conduit installed in new parking lots that may be used for future solar PV systems.
Objective 7.2 Promote energy conservation.	
Policy 7.2.1: Support energy conservation by requiring sustainable building design and development for new residential, commercial and industrial projects.	**Consistent.** The proposed project will be designed to meet the Title 24, Part 6 building standards that require the incorporation of energy-efficient building features into the new structures.
Policy 7.2.2: Support energy conservation by using low-emission non-fossil fuel reliant vehicles.	**Consistent.** The project will be required to meet the most current Title 24, Part 11 standards that require EV charging systems into new parking lots.

Source: Appendix A, Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis

5.7 Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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- 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?	☐	☒	☐	☐

Discussion

The below analysis is based on the project's geotechnical study, *Geotechnical Investigation and Geohazard Report* (Geotechnical Investigation), prepared by Fenagh Engineering and Testing, dated June 28, 2024, included as Appendix D of this IS/MND.

a-i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Less Than Significant Impact. The project site is not located within an Alquist-Priolo Earthquake Fault Zone.[14] As identified in Appendix D, the closest known active or potentially active faults are the Ord Mountains fault which is approximately 12.5 miles southeast of the site and the Helendale fault which is 12.5 miles to the northeast of the site. The Mirage Valley fault is also nearby at 13 miles to the northwest. As determined in Appendix D, the potential for surface rupture of active faults onsite is considered low. Impacts would be less than significant in this regard.

a-ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. The project is located in Southern California, which is prone to ground shaking. Ground shaking is responsible for the majority of damage from earthquakes and can damage or destroy buildings. The intensity of shaking depends on the type of fault, distance to the epicenter, magnitude of the earthquake, and subsurface geology. Although the project site is not located within an active earthquake fault zone, nearby fault systems could produce earthquakes with the potential to cause substantial ground motion that could result in serious injuries or deaths, as well as significant property damage, due to the seismic activity of the region.[15] The proposed improvements would be designed and constructed in compliance with the current CBC to ensure the proposed improvements would withstand projected seismic activity. Further, the District would condition to the project to adhere to the recommendations provided in Appendix D. Appendix D contains specific recommendations to accommodate ground shaking due to seismic activity As the design of the proposed improvements would incorporate appropriate engineering design in conformance with the recommended geotechnical standards for construction and site-specific geotechnical recommendations, project implementation would not expose people or structures to potential substantial adverse effects from seismic ground shaking. Impacts would be less than significant.

[14] California Department of Conservation, Earthquake Zones of Required Investigation, accessed August 20, 2025, https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.
[15] California Department of Conservation, Fault Activity Map of California, accessed August 25, 2025, https://maps.conservation.ca.gov/cgs/fam/.

a-iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction results when water-saturated, sandy, unstable soils are subject to intense shaking, such as that caused by an earthquake. These soils lose cohesiveness, causing unreinforced structures to fail. Based on existing geological maps and encountered subsurface conditions, liquefaction potential is low for the project site as the site is not within any liquefaction zones.[16] The project would be designed and constructed with appropriate engineering and would adhere to the latest CBC to minimize seismic-related ground failure, including liquefaction. Therefore, impacts are less than significant impact.

a-iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less Than Significant Impact. The project site is characterized as relatively flat, with no significant slopes. Additionally, the project site is not within landslide hazard zones, thus leaving little potential for landsliding on the project site. Impacts would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The project would disturb more than one acre of soil; therefore, a Stormwater Pollution Prevention Plan (SWPPP) would be in place, which includes best management practices (BMP) for erosion- and sediment-control during construction. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, and gravel bags. Post construction, all disturbed areas within the project site would be paved, landscaped, or constructed with the proposed structures. Landscaping would be maintained, and any stormwater runoff would be collected into an underground drainage system. Therefore, compliance with regional and local permitting and regulation would ensure soil erosion or loss of topsoil during project construction and operation are less than significant.

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

Less Than Significant Impact. Refer to Responses 3.7(a)(i) through 3.7(b) above. Development on hillside areas where steep slopes are present can increase rates of erosion and exacerbate landslide hazards, lateral spreading, liquefaction, or collapse, which may threaten structures. As identified in Appendix D, the project site is not located within an Alquist-Earthquake Fault Zone, liquefaction zone, landslide zone, or subsidence zone.[17] Accordingly, project implementation would not result in on-site or off-site

[16] California Department of Conservation, Earthquake Zones of Required Investigation, accessed August 20, 2025, https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.
[17] California Department of Conservation, Earthquake Zones of Required Investigation, accessed August 20, 2025, https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.

landslides, lateral spreading, subsidence, liquefaction, and/or collapse due to unstable geologic units or soils. Impacts would be less than significant.

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

Less Than Significant Impact. The project is located in the Mojave Desert, which is characterized by broad alluvial basins. The project site is located primarily on the broad surface of a large alluvial fan referred to as the Cajon Fan (Victorville Fan). Expansive soils could cause damage to facility components if they are not designed with proper engineering and grading practices. However, the hazard associated with expansive soils is considered a low risk for alluvial fan locations because soils in this area are frequently saturated and generally do not contain clay-sized particles. According to Appendix D, percolation testing revealed that fill materials were underlain by native alluvial soils, consigning predominantly of silty sands and sands with occasional gravel. However, in the case of shrinkage or expansive soils, the expansive soils would be removed and replaced with non-expansive soil or aggregate base for construction. Therefore, less than significant impacts would occur.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project does not propose the use of septic tanks or alternative wastewater disposal systems. The project would connect to existing sewer facilities. No impact would occur in this regard.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. The City of Victorville includes nine ancient lakebed deposits estimated to date back to the Pleistocene Epoch (10,000 to 900,000 years ago). The lakebeds contain numerous mammalian fossils, including teeth, limb fragments, phalanges and metacarpal from horses, camels and other large animals. According to the City, except for areas above the 2,985-foot contour or below the 2,727-foot contour, the City is located upon fossil-bearing strata.[18] The elevation of the campus ranges from a high of approximately 2,910 feet amsl along the western perimeter to a low average of 2,885 along the eastern perimeter. Accordingly, the project site is considered to be sensitive for paleontological resources.[19] Therefore, the District will implement Mitigation Measure GEO-1, which provides for measures during the inadvertent find of fossils or other paleontological resources. With the implementation of Mitigation Measure GEO-1, the project would have a less than significant impact on destroying a unique paleontological resource or unique geological feature.

[18] City of Victorville, Resource Element, accessed August 2025, https://www.victorvilleca.gov/home/showpublisheddocument/13949/638237230263170000.
[19] City of Victorville, Resource Element, accessed August 2025, https://www.victorvilleca.gov/home/showpublisheddocument/13949/638237230263170000.

Mitigation Measures

GEO-1 In the event an unanticipated fossil or other paleontological resource discovery is made during project development, in accordance with the Society of Vertebrate Paleontology (SVP) 2010 guidelines, a qualified professional paleontologist shall be retained to provide or supervise a paleontological sensitivity training to all personnel involved with earth-moving activities. The training session shall focus on how to identify paleontological resources, such as fossils that may be encountered, and the procedures to follow if encountered during construction.

The qualified paleontologist shall monitor earthwork affecting the aforementioned geological units or supervise the monitoring of these activities by a paleontological monitor. If any paleontological resources are encountered on the project site, the qualified paleontologist or the paleontological monitor shall halt all ground-disturbing activities within 50 feet of the find until a significance determination is made. If the fossils are determined to be significant, the qualified paleontologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:

- The paleontologist shall ensure that all significant fossils collected are cleaned, identified, catalogued, and permanently curated with an appropriate institution with a research interest in the materials (such as the Los Angeles County Museum);
- The paleontologist shall ensure that specialty studies are completed, as appropriate, for any significant fossil collected; and
- The paleontologist shall ensure that curation of fossils is completed in consultation with the City. A letter of acceptance from the curation institution shall be submitted to the City.

The qualified paleontologist will determine when work within the immediate vicinity of the find may resume, or otherwise expand or reduce the construction exclusion buffer as warranted to ensure proper treatment of resources. The qualified paleontologist may reduce the frequency of monitoring, or cease monitoring altogether if observations of specific site conditions warrant.

5.8 Greenhouse Gas Emissions

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Discussion

To evaluate the project's potential to result in impacts regarding GHG emissions, the *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis for the Challenger School of Sports and Fitness Sports Complex Project in Victorville*, *San Bernardino, California* (Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis) was prepared by Vista International, dated March 28, 2025; refer to Appendix A of this IS/MND.

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

Less Than Significant Impact. The proposed project is anticipated to generate GHG emissions from construction activities and from operational activities, which would include area sources, energy usage, mobile sources, waste disposal, and water usage.

The MDAQMD shares responsibility with the California Air Resources board for ensuring that all state and federal GHG standards are achieved and maintained within its jurisdiction. The MDAQMD Guidelines provide a project-level significance threshold of 100,000 tons of carbon dioxide equivalent (CO_2e) per year for both construction and operational activities.

The project's GHG emissions have been calculated utilizing CalEEMod; refer to Table 5.8-1, *Project Related Greenhouse Gas Emissions (Annual)*.

TABLE 5.8-1: PROJECT RELATED GREENHOUSE GAS EMISSIONS (ANNUAL)

	Greenhouse Gas Emissions (Metric Tons per Year)			
Category	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
Construction				
Year 2026	262	0.01	0.01	263
Year 2027	74.1	<0.01	<0.01	74.5
Total Construction Emissions	**336**	**0.01**	**0.01**	**338**
Amortized Construction Emissions[1] (30 Years)	**11.2**	**<0.01**	**<0.01**	**11.3**
Operations				
Mobile Sources[2]	115	<0.01	<0.01	117
Area Sources[3]	0.19	<0.01	<0.01	0.19
Energy[4]	73	<0.01	<0.01	73
Water and Wastewater[5]	7.20	0.18	0.00	12.9
Solid Waste[6]	0.03	<0.01	<0.01	0.11
Refrigeration[7]	--	--	--	0.01
Total Operational Emissions	**195**	**0.19**	**0.01**	**204**
Total Annual Emission (Construction & Operations)	**207**	**0.19**	**0.01**	**215**
MDAQMD Threshold				**100,000**
Exceed Thresholds?				**No**

Notes:

[1] Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

[2] Mobile sources consist of GHG emissions from vehicles.

[3] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

[4] Energy usage consists of GHG emissions from electricity used and generated on-site.

[5] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

[6] Waste includes the CO_2 and CH_4 (methane) emissions created from the solid waste placed in landfills.

[7] Refrigeration includes GHG emissions from refrigerants used in air conditioning units.

Calculated using CalEEMod Version 2022.1.

Source: Appendix A, Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis

As shown in Table 5.8-1, construction activities would create a total of 338 metric tons (MT) of CO_2e, which equates to 11.3 $MTCO_2e$ per year, when amortized over 30 years. Table 5.8-1 also shows that operational activities would create 204 $MTCO_2e$ per year. When combined with the amortized construction emissions, the proposed project would create a total of 215 $MTCO_2e$ per year, which is well under the MDAQMD threshold of 100,000 $MTCO_2e$ per year. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. As shown in Table 5.8-1, the proposed project is anticipated to create 215 $MTCO_2e$ per year, which is well below the MDAQMD threshold of significance of 100,000 $MTCO_2e$ per year. The MDAQMD developed this threshold in order to meet the state GHG emissions reduction regulations. Therefore, the proposed project would be consistent with state GHG emission reduction regulations, and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Accordingly, impacts would be less than significant.

5.9 Hazards and Hazardous Materials

Would the project:

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

Discussion

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

Less Than Significant Impact. Materials considered hazardous are those on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined by the California Health and Safety Code Section 25501 as follows:

> A "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

Thus, the term hazardous material is a broad term for all substances that may be hazardous, specifically including hazardous substances and hazardous waste. Substances that are flammable, corrosive, reactive, oxidizers, radioactive, combustible, or toxic are considered hazardous. The release of hazardous materials into the environment could potentially impact human health and contaminate soils, surface water, and groundwater supplies.

Construction of the project would involve the temporary use, storage, and transport of hazardous materials, such as asphalt, fuels, lubricants, paints, cleaners, and solvents. Incidental spills and leaks of such substances associated with routine use during construction represent a potential hazard to human health and the environment if not properly stored and handled. The District requires that all potentially hazardous materials used during construction be handled and disposed of in accordance with the manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the District and its construction contractor would comply with existing federal, state, and local regulations related to the transport, use, management, and disposal of hazardous materials, including but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts, Department of Transportation, Department of Toxic Substances Control, Lahontan Regional Water Quality Control Board, and the MDAQMD. The existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Additionally, the disposal of hazardous materials would occur in a manner consistent with applicable regulations and at an appropriate off-site disposal facility. As the project would disturb more than one acre of land, the District would be required to prepare a SWPPP for the project. The SWPPP would include measures to reduce the release of hazardous materials from construction sites via stormwater runoff, in compliance with the latest National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges.

Operation of the proposed improvements would involve the routine use of hazardous materials for landscaping and facility maintenance; use of these materials would be similar to those used for current operation of the school. In general, schools do not generate significant amounts of hazardous materials, and only a necessary amount of common day-to-day materials is stored on-site. These materials would be used, stored, and disposed of in accordance with existing regulations and product labeling and would not create a significant hazard to the public or to the environment. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the project would be less than significant.

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

Less Than Significant Impact. As discussed in Response 5.9(a), the District would comply with existing federal, state, and local regulations concerning the routine transport, storage, use, and disposal of hazardous materials. Beyond their use during project construction and maintenance of the proposed improvements, operational characteristics of the proposed track and field itself, including athletic events and gathering of people at the project site, would not be inherently dangerous or hazardous. Therefore, an upset and accidental condition causing release of hazardous materials into the environment would be negligible, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is on the Challenger School campus, and there are no other existing or proposed schools within one-quarter mile of the project site. As discussed in Responses 5.9(a) and 5.9(b), the District would comply with applicable federal, state, and local regulations concerning the transport, storage, use, handling, and disposal of hazardous materials during construction and operation of the project. Operation of the proposed track and field would be similar to that of the existing school field uses and would not be inherently dangerous or hazardous. Additionally, all construction areas would be secured to limit student trespass. Hazardous materials would be appropriately stored and locked away, thus further reducing the exposure of hazardous materials to students on the campus. Project construction would also comply with the MDAQMD's rules and regulations, which would further reduce construction-related air pollution and maintain healthy air quality. Therefore, impacts would be less than significant.

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

No Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile lists of hazardous materials sites and waste facilities, also known as the Cortese List, that are overseen by the Department of Toxic Substances Control, California Department of Public Health, State Water Resources Control Board, and California Integrated Waste Management Board. A desktop

search of these databases was conducted to determine if the project site is on the Cortese List.[20] The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or 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 Southern California Logistics Airport (SCLA) is located approximately 3.7 miles northwest of the project site. The project site is not within an airport land use plan or the SCLA Specific Plan.[21] As such, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City of Victorville has identified Challenger School as an emergency shelter.[22] During a disaster, emergency shelters may offer emergency first aid, disseminate information, provide shelter for persons in need, and serve as a community information center where individuals can leave messages for friends and relatives. The project would not remove the project site as an approved emergency shelter. However, project construction would temporarily eliminate use of the grass field portion of the project site from use as a shelter should there be a disaster. The construction area would be fenced, and other areas of the school would be available for use as an emergency shelter. Post-construction, the expanded school site would be available for use as an emergency shelter.

Challenger School is adjacent to two existing streets: Hopland Street and Cahuenga Road. Hopland Street and Cahuenga Road are not identified by the City as evacuation routes. The project would be implemented on the southwest portion of and south of the existing school, away from Hopland Street. Additionally, construction staging would occur off-street and within District-owned property. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

[20] California Environmental Protection Agency, Cortese List Data Resources, accessed March 18, 2025, https://calepa.ca.gov/sitecleanup/corteselist/.
[21] City of Victorville Development Department, 2021, *Southern California Logistics Airport Specific Plan*.
[22] City of Victorville, 2022, *2021-2029 Safety Element*, https://www.victorvilleca.gov/home/showpublisheddocument/13959/638237231632670000.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The project site is not located within a designated fire hazard area.[23] Moreover, the proposed improvements would comply with the CBC, which would promote fire and life safety. The proposed improvements would include current-code fire systems, including but not limited to sprinkler systems, fire alarm systems, fire flow, and fire protection equipment. All construction plans would be checked by the Division of the State Architect and reviewed by the local fire authority, the Victorville Fire Department, to ensure adequate access to roads, fire lanes, and fire hydrant locations and fire water pressure. Project implementation would not expose people or structures to a significant risk of loss, injury, or death involving wildfires. No impact would occur.

[23] City of Victorville, 2022, *Local Hazard Mitigation Plan*, https://www.victorvilleca.gov/home/showdocument?id=9601&t=637862370648270000.

5.10 Hydrology and Water Quality

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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 off-site?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Discussion

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Water quality impacts from short-term construction operations would consist of the discharge of pollutants, including primarily sediment from grading operations, as well as oil and grease from equipment, trash from worker and construction activities, heavy metals, pathogens, and other substances. Discharge of these pollutants into waters of the United States are regulated by the State Water Resources Control Board.

The State Water Resources Control Board has adopted General Permit No. CAS000002 - Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activity (General Permit) for California, which applies to most construction-related stormwater discharges within California. The General Permit requires that projects disturbing greater than one acre develop and implement a SWPPP that specifies BMPs to prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters. As the project will disturb approximately 8.1 acres, the project would be subject to the provisions of the NPDES General Permit and would be required to submit a SWPPP to the Lahontan Regional Water Quality Control Board. Compliance with such measures would reduce construction-related impacts on water quality to less than significant.

Post-construction, development is not anticipated to result in significant impacts to water quality or waste discharge requirements. The project proposes a new storm drain system of pipes, inlets, and catch basins. Stormwater would be directed to an underground storm drain infiltration system located under the proposed parking lot southeast of the proposed track and field. The new facilities would ensure that the rate of runoff would be similar to or slower than existing conditions, and that runoff leaving the site complies with all applicable water quality standards.

The project would be required to obtain approval of a Water Quality Management Plan (WQMP) from the City's Public Works Department. The WQMP would identify BMPs (including design criteria for treatment control) for the management of urban stormwater runoff relative to the rate, amount, and quality of water leaving a property. By addressing site design, source control, and treatment control BMPs on a project-specific and/or subregional or regional basis, the WQMP is intended to ensure that the cumulative, regional impact of urban stormwater runoff is properly managed. The WQMP would be incorporated by reference or attached to the project's SWPPP as the Post-Construction Management Plan. Further, the project would be required to comply with the mandatory NPDES requirements to control and reduce the potential for water quality impacts to occur. Project conformance with the NPDES permit, SWPPP, and WQMP would be required prior to, during, and/or after construction. As such, potential impacts relative to water quality would be reduced to a less than significant level.

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

Less Than Significant Impact. According to the City's General Plan EIR, the Victorville Water District (VWD) provides water services to the City. The VWD's *2020 Urban Water Management Plan* (UWMP) evaluates

the VWD's water supplies to ensure adequate water supplies are available to meet existing and future demands. As indicated in the UWMP, the VWD's water supply is groundwater pumped from the Mojave River Groundwater Basin. The VWD has 34 active groundwater wells within its distribution system that are used to pump groundwater from the basin. The UWMP concluded that the VWD has adequate water supplies to meet demands during average, single-dry, and multiple-dry years throughout the 25-year planning period. Further, the project does not introduce any new uses that would significantly increase the school's need for water supplies. Accordingly, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

c.i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The project site does not contain any streams or rivers. The proposed improvements would increase the impervious area on the project site. However, the project proposes stormwater improvements, including a new storm drain system of pipes, inlets, and catch basins; refer to Response 5.10(a) above. These improvements would minimize erosion and siltation on- and off-site. The project site would not include any large areas of exposed soils that would be subject to runoff. Rather, any exposed areas would be landscaped to minimize the potential for erosion or siltation on- or off-site. The proposed project would include operational BMPs in conformance with City requirements in order to reduce long-term water quality impacts to less than significant levels; refer to Response 5.10(a). Impacts would be less than significant in this regard.

c.ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed in Response 5.10(a), surface runoff would be directed to an underground storm drain infiltration system located under the proposed parking lot southeast of the proposed track and field. The new facilities would ensure that the rate of runoff would be similar to or slower than existing conditions, and that runoff leaving the site complies with all applicable water quality standards. Accordingly, the project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. A less than significant impact would occur.

c.iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Refer to Responses 5.10(a), 5.10(c)(i) and 5.10(c)(ii), above. The proposed stormwater improvements would ensure the project would not 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. Impacts would be less than significant.

c.iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

No Impact. Based on a review of the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer flood zone map, the project site is within FEMA Zone X, an area with "0.2% annual chance of flood hazard, areas of 1% annual chance of flood hazard, with average depth of less than one foot or with drainage areas of less than one square mile."[24] Accordingly, the project would not impede or redirect flood flows. No impact would occur in this regard.

d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Refer to Response 5.10(c)(iv) above, the project site is located outside of the 100-year flood hazard area. As a result, no impact would occur in this regard.

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is not located within proximity to the Pacific Ocean or any other large body of water. No impact would occur in this regard.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The project site is not in the vicinity of a reservoir, harbor, lake, or storage tank capable of creating a seiche. No impact would occur in this regard.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Refer to Responses 5.10(a) and 5.10(b), above. The project would be subject to the provisions of the NPDES General Permit and would be required to submit a SWPPP to the Lahontan Regional Water Quality Control Board to reduce project-related impacts on water quality. Further, the project would be required to obtain approval of a WQMP from the City for the management of urban stormwater runoff relative to the rate, amount, and quality of water leaving the property in compliance with the City's Municipal Code Chapter 10.30, *Storm Water and Urban Runoff Management and Discharge Control*. By addressing BMPs on a project-specific and/or subregional or regional basis, the WQMP would ensure that potential impacts related to urban stormwater runoff are properly managed. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

[24] Federal Emergency Management Agency, FEMA Flood Map Service Center: Search By Address, accessed March 12, 2025, https://msc.fema.gov/portal/search?AddressQuery=14777%20Hopland%20Street%20victorville.

5.11 Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Discussion

a) Would the project physically divide an established community?

No Impact. The factors that could physically divide a community are generally large, linear infrastructure projects including, but are not limited to construction of major highways or roadways; construction of storm channels; closing bridges or roadways; and construction of utility transmission lines. The project does not include or propose any features that would physically divide an established community. No impact would occur in this regard.

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

No Impact. The project has a General Plan land use designation of Low Density Residential and is zoned R-1. Schools and other uses compatible with suburban low-density neighborhoods are allowable land uses under the Low Density Residential designation.[25] As such, the project is consistent with existing zoning and planned uses as outlined in the City's General Plan and Municipal Code. No changes to the existing land use designation are required or proposed with the project. The project would result in an expansion of the school campus. The existing use of the site (public school facilities) would remain the same, and would not conflict with the intended use of the campus or with surrounding land uses. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

[25] City of Victorville, 2022, *Victorville Land Use Element,* https://www.victorvilleca.gov/home/showpublisheddocument/13961/638237235345270000.

5.12 Mineral Resources

Would the project:

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

Discussion

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

No Impact. California's Surface Mining and Reclamation Act of 1975 requires the State Geologist to classify land into mineral resource zones (MRZ) based on the known or inferred mineral resource potential of that land. The California Department of Conservation's Mineral Resources Program provides data about California's varied non-fuel mineral resources (such as metals and industrial minerals), naturally occurring mineral hazards (such as asbestos, radon, and mercury), and information about active and historical mining activities throughout the state. Classification is completed by the State Geologist: Lands classified MRZ-1 are areas where geologic information indicates no significant mineral deposits are present; lands classified MRZ-2 are areas that contain identified mineral resources; lands classified MRZ-3 are areas of undetermined mineral resource significance; and lands classified MRZ-4 are areas of unknown mineral resource potential.

The City's General Plan Resource Element identifies sand, gravel, or stone deposits that are suitable as sources of concrete aggregate as mineral resources within the City. According to Figure RE-1, *Victorville Planning Area Mineral Land Classification Map*, from the City's General Plan Resource Element, the project site is classified as MRZ-3a, a subclassification of MRZ-3. The MRZ-3a classification is reserved for areas containing known mineral occurrences of undetermined mineral resource significance. However, the areas of the City within the MRZ-3a designation are primarily designated and zoned for future development, and known deposits of significant aggregate mineral deposits are located along the Mojave River. As such, development under the General Plan was not expected to result in the loss of a locally important mineral resource recovery site, pursuant to the associated EIR. There would be no impact. Accordingly, the project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. No impact would occur in this regard.

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

No Impact. Refer to Response 5.12(a) above.

5.13 Noise

Would the project result in:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Discussion

The analysis below is based on the project's noise study, *Noise Impact Analysis Challenger Elementary School Sports Complex Project City of Victorville,* prepared by Vista Environmental, dated April 4, 2025, and included as Appendix E of this IS/MND.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction-Related Noise

Construction activities for the proposed project are anticipated to start around March 2026 and would take approximately one year to complete. Construction activities are anticipated to include site preparation and grading of approximately 8.1 acres, building construction of the track and field, paving of the parking lot and hardscape areas, and application of architectural coatings.

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and

the timing and duration of the construction activities. The nearest sensitive receptors are single-family homes on the east side of Carmelia Drive, approximately 360 feet from the project site. There are also single-family homes on the north side of Hopland Street, approximately 600 feet from the project site.

Section 16-6.12.060(9) of the City's Development Code exempts construction noise from the City noise standards provided that the Building Official determines the construction activities are essential to completion of the project. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities; therefore, even with adherence to the City standards, the construction noise levels may result in a significant substantial temporary noise increase to the nearby residents.

In order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the Federal Transit Administration (FTA) construction noise criteria thresholds, detailed in Table 5.13-1, *FTA Construction Noise Criteria*, were utilized. Based on the FTA construction noise criteria thresholds, a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at any of the nearby homes.

TABLE 5.13-1: FTA CONSTRUCTION NOISE CRITERIA

Land Use	Day (dBA Leq (8-hour))	Night (dBA Leq (8-hour))	30-Day Average (dBA Ldn)
Residential	80	70	75
Commercial	85	85	80[(1)]
Industrial	90	90	85[(1)]
Notes: [(1)] Use a 24-hour $Leq_{(24\ hour)}$ instead of $Ldn_{(30\ day)}$			

Source: Appendix E, Noise Impact Analysis

Construction noise impacts to the nearby sensitive receptors have been calculated through use of the Roadway Construction Noise Model and the parameters and assumptions detailed in Table F of Appendix E that shows the anticipated construction equipment per phase. The results are shown below in Table 5.13-2.

TABLE 5.13-2: CONSTRUCTION NOISE LEVELS AT THE NEAREST SENSITIVE RECEPTORS

Construction Phase	Construction Noise Level (dBA Leq) at:	
	Nearest Homes to the East[1]	Nearest Homes to the North[2]
Site Preparation	64	62
Grading	64	61
Building Construction	65	62
Paving	60	57
Painting	52	49
FTA Construction Noise Threshold	80	80
Exceed Thresholds?[3]	No	No

Notes:
[1] The nearest homes to the east are located as near as 640 feet from the center of the area to be disturbed.
[2] The nearest homes to the north are located as near as 870 feet from the center of the area to be disturbed.
[3] The FTA Construction noise thresholds are detailed above in Table C.
Source: Appendix E, Noise Impact Analysis

Table 5.13-2 shows that the greatest noise impacts would occur during the building construction phase, with a noise level as high as 65 dBA Leq at the nearest homes to the east. Table 5.13-2 also shows that none of the construction phases would exceed the FTA noise standard of 80 dB at the nearby homes. Therefore, construction-related noise levels would not exceed any standards established in the General Plan or Noise Ordinance, nor would construction activities create a substantial temporary increase in ambient noise levels from construction of the proposed project. Impacts would be less than significant.

Operational-Related Noise

The proposed project would consist of the development of a track and field facility. Potential noise impacts associated with its operations would be from project-generated vehicular traffic on the nearby roadways as well from on-site noise impacts. The roadway noise impacts and on-site noise impacts have been analyzed separately below.

Roadway Vehicular Noise Impact to Nearby Homes

Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. The level of traffic

noise depends on three primary factors: (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed project does not propose any uses that would require a substantial number of truck trips, nor would it alter the speed limit on any existing roadway. Therefore, the proposed project's potential off-site noise impacts have been focused on those impacts associated with the change of volume of traffic that would occur with development of the proposed project.

Since the General Plan does not quantify what is a significant roadway noise increase, the roadway noise threshold from the *Draft Program Environmental Impact Report City of Victorville General Plan 2030* has

been utilized, which details that a potentially significant road noise impact is one that would cause noise levels to increase over 65 CNEL or, if already over 65 CNEL, to increase by 3 dB or more when adjacent to noise-sensitive uses. Since the roadway noise calculations show that all analyzed nearby sensitive receptors currently exceed 65 CNEL, the latter method (evaluating noise increases when the traffic noise increases by 3 dBA CNEL) has been used.

The *Challenger School of Sports and Fitness – Trip Generation & VMT Screening Assessment* (Traffic Analysis), prepared by Michael Baker International, dated December 9, 2024, found that the proposed project would generate 93 daily trips. The nearest road segment to the project site analyzed in the DPEIR is Hopland Street between El Evado Road and Llanada Avenue, which had 800 daily trips in 2005 and is anticipated to have 7,300 daily trips in 2035.

For project-generated vehicular traffic to increase the noise level of Hopland Street in the vicinity of the project site by 3 dB, the roadway traffic would have to double. Since the proposed project would increase the traffic volume on Hopland Street by a maximum of 12 percent when compared to year 2005 conditions, the project-related roadway noise increase is anticipated to be negligible and well below the 3 dBA road noise. Operational roadway noise impacts would be less than significant.

On-site Noise Impacts to Nearby Sensitive Receptors

As detailed above, operation of the track and field facility may create on-site noise impacts to the nearby homes. Sections 16-6.12.040 and 16-6.12-050 of the Municipal Code limit the noise levels at the nearby homes to 65 dBA between 7:00 a.m. and 10:00 p.m. and 55 dBA between 10:00 p.m. and 7:00 a.m. Section 16-6.12-060(3) of the Municipal Code exempts activities conducted on the grounds of any elementary school from the above City noise standards. However, in order to provide a conservative analysis, the City noise standards have been utilized to determine if the project would create a significant noise impact. The noise levels at the nearby homes to the east and north were calculated based on the methodology detailed above and Table 5.13-3 shows the calculated noise levels at the nearby homes.

TABLE 5.13-3: OPERATIONAL TRACK AND FIELD NOISE LEVELS AT THE NEARBY HOMES

Noise Source	Construction Noise Level (dBA Leq) at:[1]	
	Homes to East[2]	Homes to North[3]
Track and Field	45	43
City of Victorville Noise Standards (Day/Night)[4]	65/55	65/55
Exceed City Noise Standard (Day/Night)	No/No	No/No

Notes:

[1] Noise levels calculated based on a reference noise level of 62 dB at 1 meter, a standard geometric spreading of noise, which results in a 6.0 dB drop in noise when distance is doubled, and accounts for existing and proposed walls and grade difference.

[2] The distance from the proposed track and field to the nearest homes to the east is 550 feet.

[3] The distance from the proposed track and field to the nearest homes to the north is 750 feet.

[4] Obtained from Sections 16-6-12-040 and 16-6.12-050 of the Municipal Code.

Source: Appendix E, Noise Impact Analysis

Table 5.13-3 shows that operation of the proposed track and field would create a noise level as high as 45 dBA at the homes to the east and 43 dBA at the homes to the north. These levels would be below the City's residential daytime standard of 65 dBA and nighttime noise standard of 55 dBA. Therefore, the operation of the proposed project would not create a substantial increase in ambient noise levels that are in excess of applicable noise standards. Impacts would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. The following section analyzes the potential vibration impacts associated with the construction and operations of the proposed project.

Construction-Related Vibration Impacts

Vibration impacts from construction activities associated with the approximately 8.1-acre impacted project site would typically be created from the operation of heavy off-road equipment. The nearest sensitive receptors to the project site are single-family homes located on the east side of Carmelia Drive, approximately 360 feet away.

Since neither the Municipal Code nor the General Plan provide a quantifiable vibration threshold for temporary construction activities, guidance from the *Transportation and Construction-Induced Vibration Guidance Manual*, prepared by the California Department of Transportation (dated April 2020), has been used, which defines the threshold of perception from transient sources such as off-road construction equipment at 0.25 inches per second peak particle velocity (PPV).

The primary source of vibration during construction would be from a bulldozer. Table 5.13-4 shows typical vibration propagation rates based on equipment where, for example, a large bulldozer would create a vibration level of 0.089 inches per second PPV at 25 feet. Based on these rates, the vibration level at the nearest off-site homes (360 feet to the east) would be 0.005 inches per second PPV. The vibration level would be well below the 0.25 inch per second PPV threshold detailed above. Impacts would be less than significant.

TABLE 5.13-4: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment		Peak Particle Velocity (inches/second)	Approximate Vibration Level at 25 Feet
Pile driver (impact)	Upper range	1.518	112
Pile driver (impact)	Typical	0.644	104
Pile driver (sonic)	Upper range	0.734	105
Pile driver (sonic)	Typical	0.170	93
Clam shovel drop (slurry wall)		0.202	94
Vibratory roller		0.210	94
Hoe ram		0.089	87
Large bulldozer		0.089	87
Caisson drill		0.089	87
Loaded trucks		0.076	86
Jackhammer		0.035	79
Small bulldozer		0.003	58

Source: Appendix E, Noise Impact Analysis

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest airport is SCLA, which is located 3.7 miles northwest of the project site. The project site is located outside of the 60 dBA CNEL noise contours for this airport. Therefore, the nearby homes would not be exposed to excessive aircraft noise. No impact would occur.

5.14 Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Discussion

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

No Impact. The project consists of the creation of a track and field at Challenger School that would support existing students. The improvements would also benefit existing community users interested in renting a track and field or large gathering space. Maintenance of the facility would be by the school's existing custodial staff, and the scheduling of events outside of normal school hours would be by the school and/or other District employees. The project would serve the existing Victorville community, and its operations would not generate new students or faculty or induce unplanned population growth in the area, which is typically associated with the development of new homes, roads, and infrastructure.

Project construction would require workers. Given the temporary nature of construction industry jobs and the relatively large construction industry in the region, the labor force from within the region would be sufficient to complete project construction without necessitating an influx of new workers and their families. Therefore, both project operation and construction would not directly or indirectly induce population growth, and there would be no impact.

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

No Impact. The project site includes a portion of the grass sports field of the campus and disturbed desert vegetation in the vacant parcel. There are no existing residences or residential uses on-site. Therefore, project implementation would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

5.15 Public Services

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:	☐	☐	☒	☐
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☒	☐	☐
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

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

Less Than Significant Impact. The Victorville Fire Department (VFD) provides fire protection and emergency medical response services for the City. Primary fire protection services would be provided by VFD Fire Station 312, located at 15182 El Evado Road, approximately 1.18 miles southwest of the project site.

During the project's construction, notice to and coordination with the VFD would be ongoing and emergency access to the project site and surrounding areas would be maintained.

An increased demand for fire protection services is typically associated with an increase in population. The proposed project would not increase the student population at the campus or include other developments, such as new residential uses, that would increase the demand for fire protection services;

refer to Section 5.14, *Population and Housing*. Although project implementation would allow extended use of the improved facilities by the school and community, the project site and surrounding area are already served by the VFD, and the extension of facility hours would not result in an additional need for fire protection services.

All plans would be checked by the Division of the State Architect to ensure the project complies with emergency access, fire, and life safety design standards of CCR Title 24, including Part 9, the California Fire Code. Additionally, the VFD Fire Prevention Division currently reviews all new development plans, and future development is required to conform with the Victorville Fire Prevention Standards, pursuant to the 2022 California Fire Code, CBC, and Victorville Municipal Code, Title 16, also referred to as the Development Code's Building and Fire Regulations.[26]

Based on the project site's proximity to an existing fire station and compliance with applicable regulations and design standards, the project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. Furthermore, the project would not adversely affect service ratios, response times, or other performance objectives.

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

Less Than Significant Impact. Police protection services for the City and project site would be provided by the San Bernardino County Sheriff's Department. The Victorville Patrol Station is located at 14200 Amargosa Road, approximately 2.3 miles from the project site.

During construction of the proposed project, notice to and coordination with the San Bernardino County Sheriff's Department would be ongoing and emergency access to the project site would be maintained. Active construction areas would be fenced and would remain secured outside of work hours.

Similar to the previous discussion on the VFD, in Response 5.15(a)(i) above, an increased demand for fire protection services is typically associated with an increase in population. The proposed project would not increase the student population at the campus; thus, the project would not create a substantial increase in the local population resulting in increased demand for law enforcement.

Although project implementation would allow extended use of the improved facilities by the high school and community, the project site and surrounding area are already served by the San Bernardino County Sheriff's Department, and the extension of facility operations would not result in an additional need for police protection services.

[26] City of Victorville, 2022, "Fire Prevention Standards," https://www.victorvilleca.gov/home/showpublisheddocument/12930/638096586994170000.

As the project does not involve the creation of new residential homes or businesses, and only expands upon the existing school site, following all security regulations for such buildings, this project would have less than significant impacts on the functions of police protection in Victorville.

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

Less Than Significant with Mitigation Incorporated. The proposed project involves physical impacts associated with Challenger School, the environmental impacts of which are discussed throughout this IS/MND. Significant environmental impacts would be mitigated to less than significant levels.

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

No Impact. The closest parks to the project site are Las Haciendas Park and Cypress Pointe Park, 0.69-mile southeast and 1.3 miles northeast of the project site, respectively.

An increase in population or housing is generally associated with an increase in demand for parks. As discussed in Section 5.14, *Population and Housing*, the project would not increase the capacity of the school nor result in an increase in housing or population. Thus, the project would not result in additional demand for the City's parks. In addition, the project would upgrade the current recreational facilities on-site (e.g., new stadium and track), improving recreational amenities available for use by current and future students, as well by the public via the Civic Center Act. Accordingly, the project would not create a need for new or expanded parks, and no impact would occur.

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

No Impact. Other public facilities located in the greater project area include the San Bernardino County Law Library, Victorville City Library, and the Hook Community Center. An increase in population or housing is generally associated with an increase in demand for other public facilities (e.g., libraries, community centers, wellness centers). The project would not result in a substantial increase in population, thus creating a direct demand for other public facilities; refer to Section 5.14, *Population and Housing*. As the project would not increase the capacity of the school or result in an increase in housing or population, there would be no impact.

5.16 Recreation

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☒	☐	☐

Discussion

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The project would serve an existing student population and would not increase student enrollment. It would not function to increase population in the area, which is generally associated with an increase in demand for parks. Moreover, through the Civic Center Act, the project would increase available recreational facilities for community use. Therefore, the project would not contribute to the physical deterioration of existing neighborhood and regional parks and recreational facilities. No impact would occur.

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?

Less Than Significant Impact With Mitigation Incorporated. The project would involve the development of new recreational facilities at Challenger School. The physical effects of the project on the environment are the focus of and evaluated throughout this document. As discussed herein, any potentially significant impacts caused by the project would be mitigated to below significance. Compliance with all Mitigation Measures (BIO-1 through BIO-4, CUL-1, and GEO-1) in this document would reduce impacts caused by the proposed recreational facilities to the physical environment to below significance.

5.17 Transportation

Would the project:

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

Discussion

To evaluate the project's potential to result in impacts regarding transportation, the project-specific report *Challenger School of Sports and Fitness – Trip Generation & VMT Screening Assessment* (Trip Generation & VMT Screening Assessment) was prepared by Michael Baker International, dated December 9, 2024; refer to Appendix F of this IS/MND.

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

Less Than Significant Impact. The project would not modify or affect any public transit stops, roadways, bicycle facilities, or pedestrian facilities. Access to the project site would be from an existing road through Cahuenga Road. Project access would not conflict with existing or planned roadways, sidewalks, bicycle facilities, or transit facilities and would be subject to review by the Division of the State Architect.

Implementation of the project would not result in any temporary or permanent road closures off-site. Project construction and operation would not affect the City of Victorville's existing and planned circulation system, including school bus routes serving Challenger School. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. A vehicle miles traveled (VMT) screening assessment was prepared for the project (see Appendix F). The project-specific VMT screening assessment used the City of Victorville's *Vehicle Miles Traveled Guidelines* dated May 27, 2020. As outlined in the City VMT Guidelines, certain projects, because of their size, nature, or location, are exempt from the requirements of preparing a detailed VMT analysis. The City has developed an approach to identify transportation impacts under CEQA for land use projects that aligns with guidance provided in the OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (2018).

The proposed project would generate 323,221 VMT per year or 886 VMT per day, which is below the threshold of 1,285 or less weekday daily trips, pursuant to the City's VMT Guidelines. Therefore, the project would be consistent with CEQA Guidelines Section 15064.3, and impacts would be less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Project implementation would include the construction of the track and field, bleachers, restrooms, and parking lot. The road within the existing parking lot would extend from Cahuenga Road to the newly proposed parking area with a total of 237 stalls. The proposed access improvements do not include any geometric design features that would substantially increase hazards. The project also does not introduce land uses that are incompatible with the surrounding residential uses. In fact, the District proposes to extend Cahuenga Road and Enramada Road for easier access to the track and field facility. Additionally, there are no obstructions at the existing driveway apron that would block views or create a dangerous intersection. Project plans would be plan-checked by the Division of the State Architect, which would ensure that project driveway intersections and internal circulation patterns are safe, with adequate sight distance, driveway widths, and stop signs where necessary for entering and exiting the site. As such, impacts would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The proposed project would not result in inadequate emergency access. Construction haul trucks and construction worker vehicles would access the project site from the existing driveway apron on Cahuenga Road via adjacent highways and roadways. Construction staging, laydown, and parking would occur on the project site; no off-site areas would be affected wherein emergency access could potentially be affected. Construction and operational activities would be phased and managed to avoid blockage of emergency routes, and coordination with the District, the City of Victorville, and emergency providers would ensure adherence to emergency access requirements.

5.18 Tribal Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☒	☐	☐
i) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

a)i) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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)?

Less Than Significant Impact With Mitigation Incorporated. The Cultural Resources Assessment conducted for the project included a pedestrian survey, an SCCIC records search, and a Sacred Lands File search with the NAHC. The SCCIC records search found one previously recorded resource (a sparse lithic scatter consisting of five pieces of chalcedony and jasper debitage) within a 0.5-mile radius of the project site. The pedestrian survey similarly identified no precontact deposits or artifacts. The search of the NAHC

Sacred Lands File was positive, indicating that tribal cultural resources have been identified in the project vicinity.

As discussed in Section 3.5(b), should previously unknown archaeological materials (e.g., flaked or ground stone tools, ceramic fragments, historic-period artifacts, faunal remains, features such as hearths or structural remnants, or similar resources) be encountered during construction, work would be halted in the immediate area, and a qualified archaeologist would be contacted to evaluate the find and recommend appropriate treatment. Impacts would be less than significant.

The project area has experienced disturbance associated with past construction. However, intact buried archaeological deposits may remain at depths below previous disturbances or in other areas around the perimeter that have not previously been disturbed. Given that archaeological site sensitivity is low to moderate and the amount of previous disturbance in the project area, implementation of Mitigation Measure CUL-1 would reduce potential impacts precontact archaeological resources. In conformance with Mitigation Measure CUL-1, if previously unknown archaeological materials (e.g., flaked or ground stone tools, ceramic fragments, historic-period artifacts, faunal remains, features such as hearths or structural remnants, or similar resources) are encountered during construction, work shall be halted in the immediate area, and a qualified archaeologist shall be contacted to evaluate the find and recommend appropriate treatment. As such, tribal cultural resources impacts would be less than significant with mitigation incorporated.

a)ii) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. Refer to Response 5.18(a)(i).

5.19 Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

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

Less Than Significant Impact. New utility systems, including electricity, potable and irrigation water, and sewer, would be installed to support the proposed facilities. Infrastructure would also be connected to existing utility lines and systems on the campus.

Water

The project site would continue to be served by the Victorville Water District (VWD). VWD water supplies primarily consist of groundwater from the Mojave Groundwater Basin. When available, the VWD supplements its groundwater supplies with purchases from the Mojave Water Agency's Regional Recharge and Recovery Project. Recycled water is also available through the Victorville Wastewater Treatment Facility and a regional wastewater treatment plant owned and operated by the Victor Valley Wastewater Reclamation Authority.

The project does not require or propose a change to the existing General Plan designation that applies to the site, and therefore, the project as proposed is consistent with future development anticipated by the City, and by the VWD in estimating anticipated water demand in its Urban Water Management Plan (UWMP). Additionally, the project would be designed in conformance with Title 24 (California Energy Efficiency Standards for Residential and Nonresidential Buildings) design requirements, which require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.

Thus, it is not anticipated that project implementation would require construction of new or the expansion of existing water facilities that would result in a significant environmental effect. A less than significant impact would occur in this regard.

Wastewater

The City of Victorville Public Works Department would provide sanitary sewer services to the project site. All proposed sewer lines within the project site would connect to existing sewer facilities. Payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. Payment of these fees would fund improvements and upgrades to surrounding sewer lines as needed and would offset the project's increase in demand for wastewater collection services. Following compliance with the relevant laws, ordinances, and regulations, as well as the specified mitigation measures identified in this document, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities that would result in a significant environmental effect. Impacts would be less than significant in this regard.

Stormwater

A new storm drain system of pipes, inlets, and catch basins would be installed below the development footprint, including below and around the track and field, varsity baseball field, tennis court facilities, new buildings, and areas with hardscape. Stormwater would be directed to an underground storm drain infiltration system located under the proposed parking lot southeast of the proposed track and field. Construction of the new storm drain improvements would be subject to compliance with applicable local, state, and federal laws, ordinances, and regulations, as well as the specific mitigation measures in this. Compliance with relevant laws, ordinances, and regulations, as well as the specified mitigation measures, would ensure the project's construction-related environmental impacts associated with the proposed storm drain improvements remain less than significant.

Dry Utilities

The project would result in the construction of new electricity utilities for the proposed improvements. Southern California Edison (SCE) provides electrical service to the project area. The project's potential environmental effects of construction are analyzed throughout this IS/MND. Construction of the project's dry utilities would be subject to compliance with applicable local, state, and federal laws, ordinances, and regulations, as well as the specific mitigation measures identified in this IS/MND. Compliance with the relevant laws, ordinances, and regulations, as well as the specified mitigation measures, would ensure the project's construction-related environmental impacts resulting with provision of dry utilities remain less than significant.

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

Less Than Significant Impact. As stated in Response 5.19(a), the VWD would provide water services to the project site. Based on the City's UWMP, the City currently sources its raw water supplies from the Mojave River Basin groundwater and purchased or imported water from the Mojave Water Agency. Raw water supplies are then treated at the Industrial Wastewater Treatment Plant, which is owned by the VWD. The UWMP forecasted the City's water demand up until 2045 based on land use; refer to Table 5.19-1, *City's Projected Demands for Water*. Based on the UWMP, the City plans on increasing the projection as well as the production of recycled water, which would be used primarily for non-potable landscape irrigation and agricultural irrigation uses; see Table 5.19-1. Additionally, potable water demands in the VWD's service area are forecast to increase from 21,865 acre-feet (AF) in 2020 to 30,480 AF in 2040; refer to Table 5.19-2. The VWD's available water supply is anticipated to meet projected demand under normal year conditions. The VWD also anticipates having sufficient water supplies to meet demands in single dry years and multiple dry years over the 2020 to 2040 period.[27] Thus, the VWD would have a sufficient water supply available to serve the project. Impacts in this regard would be less than significant.

TABLE 5.19-1: CITY OF VICTORVILLE – PROJECTED WATER DEMANDS (ACRE-FEET PER YEAR)

Use Type	Projected Water Use by Year				
	2025	**2030**	**2035**	**2040**	**2045**
Single Family	13,744	15,061	15,673	16,262	16,946
Multi-Family	2,081	2,280	2,373	2,462	2,565
Commercial (includes Institutional)	6,177	6,770	7,044	7,309	7,617
Landscape	1,235	1,354	1,409	1,462	1,523
Losses	1,483	1,625	1,691	1,755	1,829
Sales/Transfers/Exchanges to Other Agencies	900	900	900	900	900
Total	25,620	27,990	29,090	30,150	31,380

Source: City of Victorville, City of Victorville 2020 Urban Water Management Plan, Table 4-6, Demand Projections Summary, AFY DWR Table 4-2R, accessed August 2025.

27 Ibid.

TABLE 5.19-2: CITY OF VICTORVILLE – WATER SUPPLY SUMMARY (ACRE-FEET PER YEAR)

	2020	2025	2030	2035	2040	2045
VWD Potable Water Demands	21,865	24,720	27,090	28,190	29,250	30,480
Sales to Other Agencies	(865)	(900)	(900	(900)	(900)	(900)
Potable Water Subtotal	***22,730***	***25,620***	***27,990***	***29,090***	***30,150***	***31,380***
Recycled Water	722	885	979	1,075	1,149	1,139
Total Water (Potable and Recycled)	**23,452**	**26,505**	**28,969**	**30,165**	**31,299**	**32,699**

Source: City of Victorville, City of Victorville 2020 Urban Water Management Plan, Table 4-6, Demand Projections Summary, AFY DWR Table 4-2R, accessed August 2025.

Based on the project's air quality and GHG modeling, the project would result in approximately 5,462,165 gallons per year of indoor water use and 790,767 gallons per year of outdoor water use (or total 19.18 AF per year); refer to Appendix A. The project's estimated water demand of 19.18 AF per year would represent less than one percent of the City's total water demand of both 23,452 AF for 2020, the earliest year with available data in the UWMP, and 32,699 AF for 2045. Additionally, the project would be required to comply with water efficiency standards in the 2022 California Building Energy Efficiency Standards and 2022 CALGreen Code. Further, the project does not include an expansion of student capacity nor cause an increase in enrollment at Challenger School. Therefore, the sufficient water supplies would meet demands in all conditions, and impacts would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The proposed project would result in the generation of additional wastewater above existing conditions; refer to Response 5.19(a). Payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. Payment of these fees would fund improvements and upgrades to surrounding sewer lines as needed and would offset the project's increase in demand for wastewater collection services. Following compliance with the relevant state and local laws, ordinances, and regulations, it is anticipated that the City's Public Works Department would have adequate capacity to serve the project's projected wastewater demands in addition to its existing commitments. Impacts would be less than significant in this regard.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. According to the City's General Plan EIR, solid waste in the City is deposited in the Victorville Sanitary Landfill, which is operated by the County of San Bernardino Public Works Department, Solid Waste Management Division. The landfill is located at 18600 Stoddard Wells Road in the northeastern portion of the City, approximately 5.4 miles northeast of the project site. The Victorville Sanitary Landfill has a maximum permitted capacity of 93,400,000 tons per day and a remaining capacity

of 79,400,000 cubic yards. Overall, the landfill has a maximum permitted throughput of 3,000 tons per day and is expected to remain operational until 2047.[28]

Construction

Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. As indicated above, the Victorville Landfill has adequate capacity to accommodate such solid waste disposal needs over the short term. Further, all construction activities would be subject to conformance with relevant federal, state, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." The California Integrated Waste Management Act requires that at least 50 percent of waste produced be recycled, reduced, or composted. The project would also be required to demonstrate compliance with the CALGreen Code, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

Operation

Based on CalEEMod modelling, the project's operation would generate approximately 0.35 tons of solid waste per year; refer to Appendix A. The increase in solid waste generation would not be significant in quantity to affect the capacity of the landfills serving the City, as the project's solid waste generation would represent a less than one percent increase of current daily disposal quantities. Additionally, the solid waste generation would not exceed the typical daily amount of waste disposed by the City into the Victorville Sanitary Landfill. As such, the project would not result in a significant increase in solid waste generation that would impair the capacity of the landfills serving the City. Impacts in this regard would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to Response 5.19(d) above. The proposed project would comply with all federal, state, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and City recycling programs. Specifically, as mentioned, the project would be subject to California Integrated Waste Management Act, which requires that at least 50 percent of waste produced be recycled, reduced, or composted. A less than significant impact would occur in this regard.

[28] CalRecycle, *SWIS Facility/Site Activity Details Victorville Sanitary Landfill (36-AA-0045)*, accessed April 3, 2025, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652.

5.20 Wildfire

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

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

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

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

No Impact. According to the California Department of Forestry and Fire's San Bernardino County Fire Hazard Severity Zones in LRA Map, the City of Victorville is not located in or near a State responsibility area nor is the City designated as a very high fire hazard severity zone (VHFHSZ) in the local responsibility area (LRA).[29,30] Therefore, the project would not impair or physically interfere with an adopted emergency response or evacuation plan. No impact would occur.

[29] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zones,* accessed August 15, 2025, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.
[30] California Department of Forestry and Fire Protection, *State Responsibility Area (SRA) Viewer*, accessed August 2025, https://gis.data.cnra.ca.gov/apps/CALFIRE-Forestry::state-responsibility-area-sra-viewer/explore.

5.21 Mandatory Findings of Significance

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

Discussion

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 Impact With Mitigation Incorporated. As discussed in Section 5.4, Biological Resources, after implementation of Mitigation Measures BIO-1 through BIO-4, the proposed project would result in less than significant impacts to biological resources. Similarly, as discussed in Section 5.5, Cultural Resources, after implementation of Mitigation Measure CUL-1, the proposed project would result in less than significant impacts to archaeological resources. In addition, as discussed in Section 5.7, Geology and Soils, after implementation of Mitigation Measure GEO-1, the proposed project would result in less than significant impacts to paleontological resources.

Therefore, the proposed project would not potentially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop

below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. 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. A significant impact may occur if the project, in conjunction with related projects proposed for development in the City of Victorville, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the proposed project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the project site, the proposed project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the proposed project would not result in any significant and unmitigable impacts in any environmental categories. In all cases, the impacts associated with the project are limited to the project site or are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts.

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

Less Than Significant Impact. As analyzed in Section 5.3, Air Quality; Section 5.8, Greenhouse Gas Emissions; and Section 5.13, Noise, the project would result in less than significant impacts relative to air quality, GHG emissions, and noise. Accordingly, the project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant in this regard.

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