INITIAL STUDY

FOR THE

OSSUM WASH REPAIR PROJECT

Prepared for:

Victor Valley Wastewater Reclamation Authority
20111 Shay Road,
Victorville, California 92394

Prepared by:

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AUGUST 2026

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LIST OF ABBREVIATIONS AND ACROYNMS

AB	Assembly Bill
A-E	Exclusive Agriculture
amsl	above mean sea level
APE	Area of Potential Effect
AQGGA	Air Quality and Greenhouse Gas Assessment
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
BACMs	Best Available Control Measures
BMPs	Best Management Practices
BRA	Biological Resources Assessment
BUOW	Burrowing Owl
CALFIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Cal/OSHA	California Division of Occupational Safety and Health
Caltrans HDM	California Department of Transportation Highway Design Manual
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBB	Crotch's Bumble Bee
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGP	Construction General Permit
CH_4	methane
CLSM	controlled low-strength material
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPSEI	California Native Plant Society Electronic Inventory
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide emissions
CUPA	Certified Unified Program Agencies
CWA	Clean Water Act
CY	cubic yards
dB	decibel
dBA	A-weighted decibel
DIF	Development Impact Fees
DRECP	Desert Renewable Energy and Conservation Plan
DTSC	Department of Toxic Substances Control
EIR	Environment Impact Report
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Federal Insurance Rate Map
FGC	Fish and Game Code

FHSZ	Fire Hazard Severity Zone
fps	feet per second
FTA	Federal Transit Administration
°F	degrees Fahrenheit
GCC	Global Climate Change
GHG	Greenhouse Gas
HEC-RAS	Hydrologic Engineering Center River Analysis System
HSA	Hydrologic Sub-Area
HFCs	hydrofluorocarbons
HSC	Health and Safety Code
in/sec	inches per second
IPaC	Information for Planning and Consultation System
ITE	Institute of Transportation Engineers
ITP	Incidental Take Permit
LACFCD HDM	Los Angeles County Flood Control District Hydraulic Design Manual
lbs/day	pounds per day
LBVI	Least Bell's Vireo
LCI	Land Use and Climate Innovation
L_{eq}	Equivalent Continuous Sound Level
LRA	Local Responsibility Area
LSA	Lake and Streambed Alteration
LUST	Leaking Underground Storage Tank
MB	Monarch Butterfly
MBA	Mojave Basin Area
MBTA	Migratory Bird Treaty Act
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
MGS	Mohave Ground Squirrel
MICR	Maximum Individual Cancer Risk
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MRZ	Mineral resource Zone
MT/yr	metric tons per year
$MTCO_2e/yr$	metric tons of carbon dioxide emissions per year
NHPA	National Historic Preservation Act
NOI	Notice of Intent
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
N_2O	nitrous oxide
OS	Open Space
PFCs	perfluorocarbons
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Fine Particulate Matter
PPV	peak particle velocity
PRC	Public Resources Code
R	Refrigerants

RCP	Reinforced Concrete Pipe
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RSP	rock slope protection
RWQCD	Regional Water Quality Control Board
R1-T	Single Family Residential
SBCSB	San Bernardino County Sheriff's Department
SBCTA	San Bernardino County Transportation Authority
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCLA	Southern California Logistics Airport
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SMARA	Surface Mining and Reclamation Act
SO_X	sulfur oxides
SSC	Species of Special Concern
SWFL	Southwestern Willow Flycatcher
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminants
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VCP	Vitrified Clay Pipe
VdB	vibration-velocity decibel
VFD	Victorville Fire Department
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VVWRA	Victor Valley Wastewater Reclamation Authority
WEAP	Worker Environmental Awareness Program
WOTUS	Waters of the United States
WQMP	Water Quality Management Plan
YSMN	Yuhaaviatam of San Manuel Nation

PROJECT INFORMATION

Project Title	Ossum Wash Repair Project
Lead Agency Name	Victor Valley Wastewater Reclamation Authority
Address	20111 Shay Road, Victorville, California 92394
Contact Person	Latif Laari
Phone Number	(760) 246-8638
Email	llaari@vvwraca.gov

Project Location

The proposed Project is located within Ossum Wash in Victorville, CA. Ossum Wash is an ephemeral desert wash tributary to the Mojave River. Ossum Wash runs North-South, flowing northerly to its confluence with the Mojave River, approximately 850-feet north of Turner Road. Turner Road runs East-West and the Project area is located north of where the wash crosses Turner Road. The cadastral location is Section 30, Township 6 North, Range 4 West, San Bernardino Meridian. The site can be viewed on the United States Geological Survey (USGS) – Victorville Quadrangle, 7.5 Minute Series topographic map. The regional and site location are shown on **Figures 1 and 2.** The geographic coordinates for the project are: 34.573123°, -117.331398°.

Project Sponsor Name	Victor Valley Wastewater Reclamation Authority
Address	20111 Shay Road, Victorville, California 92394
Land Use Designation	Open Space
Zoning Classification	

Project Description

Introduction

Victor Valley Wastewater Reclamation Authority (VVWRA) owns two existing gravity trunk sewer pipelines (36-in Reinforced Concrete Pipe [RCP] and 42-in Vitrified Clay Pipe [VCP]) that cross Ossum Wash. These large diameter sewer pipelines transport around 1-MG of the City of Victorville's daily sewage. After recent heavy rain events, the existing grade above these pipelines has eroded substantially. VVWRA is concerned that future rain events might expose the two pipelines, making them susceptible to a pipe break and sewage spill from bedload or debris travelling down the wash during a rain event. The two existing pipelines are estimated to have approximately 4 feet of cover remaining above them. VVWRA is proposing to construct emergency improvements to the wash to mitigate the risk of pipe exposure and damage.

Project Description

To address the critical erosion issues within the wash described above, VVWRA hired Dudek to design emergency improvements to protect the sewer lines. The proposed improvements include the following:

- Installing grouted riprap on the channel side slope along the easterly side of the existing grouted riprap channel.
- Installing an extension of the grouted riprap channel from the downstream end of the existing grouted riprap to the northerly extent of the VVWRA pipeline easement.
- Installing loose riprap lined channel downstream of the proposed grouted riprap.

These proposed improvements are depicted on the site plans provided as **Figures 3 and 4**.

The above design was based on a report prepared by Dudek, dated October 2025 entitled "Ossum Wash Improvements/Basis of Design Report" that is provided as **Appendix 1.** This report relied on the San Bernardino County design criteria, which references Los Angeles County Flood Control District's (LACFCD) Hydraulic Design Manual (LACFCD HDM)(1982) and to the State of California Department of Transportation Highway Design Manual (Caltrans HDM).

A hydraulic analysis was performed using the Hydrologic Engineering Center River Analysis System (HEC-RAS) version 6.6 developed by the US Army Corps of Engineers (USACE). A proposed condition model was created to represent the proposed improvements. For details of proposed improvements, refer to **Appendix 1** for the Improvement Plans.

The existing wash upstream of Turner Road is in a semi-natural state and is not sized to convey the 100-year event. The operating depth of the channel varies within the Project reach. There is no minimum freeboard requirement because the channel is not a flood control structure. However, the average 100-year depth is 4.4 feet and the average channel depth is 8.6 feet resulting in an average freeboard of 4.2 feet.

The model resulted in a determination of riprap size as follows:

Table 1: Riprap Size Determinations

Location	Rock Size
Grouted Riprap	Class IV (300-pound)(15")
Exit Apron	Class IX (2-ton)(36")

The cutoff wall depths were determined using LACFCD HDM methodology. The LACFCD HDM provides two options for riprap levee cutoff walls: (1) Case A: extend the riprap slope below the grade of the natural watercourse to the depth indicated in the table for cut-off depths or (2) Case B: extend the slope below grade to a depth of 18-in, with a (1.75 * t) thickness, and extend longitudinally for a distance equal to the cut-off depth plus 3-ft.

For the grouted riprap channel, Dudek designed the cutoff walls to model the Case A cutoff wall typical section. The riprap will extend to the determined cutoff wall depth at a 2:1 slope. For the loose riprap, Dudek developed a modified Case B cutoff wall to minimize the extents of excavation. Dudek proposed to provide a "launchable" thickened riprap section within invert where the riprap slopes back up to grade at 2:1. As scour develops at the end of the loose riprap, rocks are able to "launch" or fall into the scour

hole. Dudek is noting this style of cut-off wall as modified Case B because no cover is provided over the top of rock because this is located within the invert as part of a fully rock lined channel.

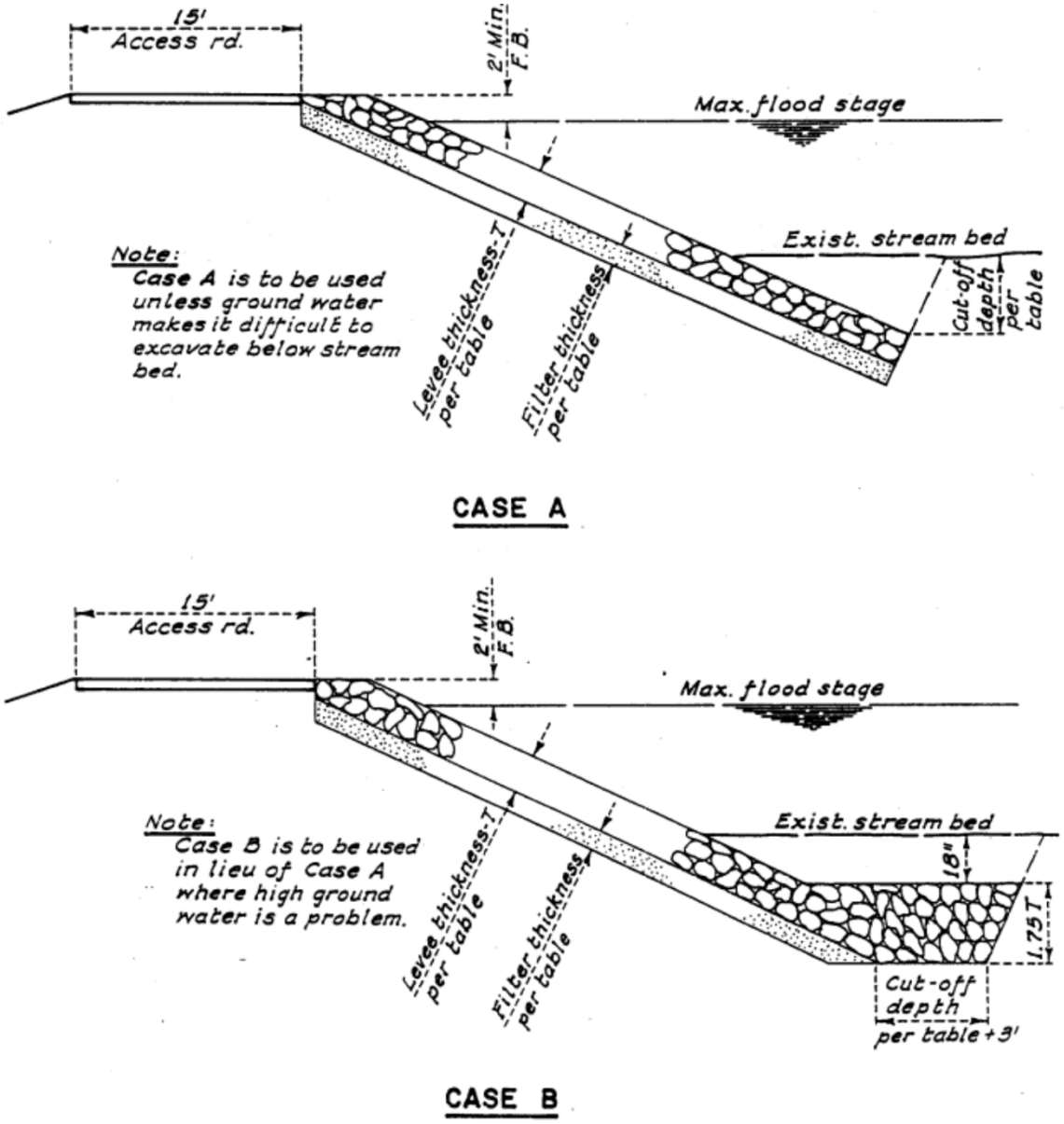


Exhibit 1: Cut-Off Depth Cases from HDM

Cut-off depth determinations and types are shown in Table 2, below.

Table 2: Cut-Off Wall Depth Determinations

Riprap Type	River Stationing[1]	Maximum Velocity (fps)	Straight Reaches	Cut-Off Wall Type
Grouted	Station 237 to 439	23.5	14	Case A
Loose	Station 283 to 327	17.1	12.5	Modified Case B

[1]Stations are shown on **Figure 5**, which depicts the Hydraulic Work Map prepared for **Appendix 1**

fps = feet per second

Construction Scenario

The Ossum Wash Repair Project construction activities are Projected to commence following permit issuance and site mobilization, spanning an estimated 4 to 6 weeks. Operations will occur during standard daytime hours within a single continuous phase, contingent upon weather conditions, site accessibility, and unforeseen field constraints.

Required equipment includes a tracked excavator, front-end loader or skid-steer, haul trucks, water truck for dust suppression, compaction rollers, concrete mixer trucks for structural elements, and support vehicles for personnel and quality oversight. A compact crew of 6 to 10 personnel—comprising equipment operators, laborers, haul truck drivers, and a foreman—will perform the work, supplemented by specialized subcontractors for concrete placement and inspections as necessary.

Excavation will generate approximately 2,500 cubic yards (CY) of cut material and 250 cubic yards of fill, with surplus material transported off-site (2,250 CY of export). This equates to an estimated 115 to 150 loads via 40-cubic-yard trucks across the Project duration, subject to variations in payload limits, material swell factors, and on-site reuse.

Riprap placement for loose rock and grouted sections will necessitate 3 to 8 delivery truck trips per day over 10 to 15 working days, aligned with the contractor's sequencing, vehicle capacities, and staging logistics.

Primary materials encompass 2-ton loose riprap, 300-pound grouted riprap, pervious backing material, Class 10 rock slope protection (RSP) fabric, controlled low-strength material (CLSM) slurry for backfill, reinforced concrete slabs for pipe protection, steel reinforcement, bonding agents, formwork, and weep tubes.

Supplementary measures include site clearing and grubbing, safeguarding of existing sewer infrastructure and utilities, implementation of stormwater best management practices (BMPs), erosion and sediment controls, and restoration of disturbed areas per contract specifications. Given proximity to the active wash and critical sewer lines, sequencing and protective protocols will be important throughout construction.

Operational Scenario

Once the Ossum Wash Repairs are completed, the channel will continue operating as it does at present, with the same variable flow rates that occur at present.

Surrounding land uses and setting:

The wash upstream of Turner Road is a natural desert wash with sandy earthen wash bottom and earthen banks. The wash crosses Turner Road via an Arizona crossing with a concrete spillway downstream of Turner Road. The concrete spillway transitions to a grouted riprap lined channel consisting of rubble and earthen materials. The grouted riprap abruptly ends and transitions to natural desert wash with an approximately 3-foot drop caused by erosion immediately downstream of the grouted riprap channel terminus. A review of recent historical aerial imagery shows evidence of erosion within the invert and side slopes in the Project area.

The channel conditions are shown on Photo 1, below.



Photo 1: Existing Conditions Grouted Rock Channel

The land uses surrounding the Project, the whole of which are located in the City of Victorville, are shown in Table 3, below.

Table 3: Surrounding Land Uses[1]

Location	Existing Land Use	Land Use Category	Zoning Classification
Project	Ossum Wash	Open Space	Exclusive Agricultural (A-E)
North of Turner Road	Ossum Wash and Mojave River	Open Space	Exclusive Agricultural (A-E)
South of Turner Road	Vacant Land	Open Space and Specific Plan	Exclusive Agricultural (A-E) and Specific Plan
East of Ossum Wash	Vacant Land and Scattered Residential Uses	Open Space, Low Density Residential	Exclusive Agricultural (A-E), Single Family Residential (R1-T)

Location	Existing Land Use	Land Use Category	Zoning Classification
West of Ossum Wash	Vacant Land and Residential and Agricultural Land	Open Space and Specific Plan	Exclusive Agricultural (A-E) and Specific Plan

[1]Victorville, 2026. City of Victorville Zoning Checker. https://victorville.maps.arcgis.com/apps/webappviewer/index.html?id=f7698c1fc6f742e681aeb3c3e3884443 (Accessed 04/14/26)

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

Implementation of the above Ossum Wash Repair Project may require a variety of approvals from other agencies. This section summarizes agency approvals that have been identified to date. This list may be expanded as the environmental review proceeds.

- The whole of the Project does not meet the threshold for a General Construction National Pollutant Discharge Elimination System (NPDES) permit, as the Project will disturb approximately less than one acre.
- If listed species are involved, the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) may have to issue incidental take permits or permits may be obtained.
- The CDFW and Colorado River Basin Regional Water Quality Control Board (RWQCB) will participate in review of any discharge of fill into or alteration of a streambed associated with the Ossum Wash Repair Project.

Assembly Bill 52 Consultation

Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?[1]

VVWRA has been contacted by one Tribe under Assembly Bill (AB) 52: the Yuhaaviatam of San Manuel Nation (YSMN). The tribe was were contacted to initiate the AB-52 process on April 20, 2026 to notify the tribe of the proposed Project through mailed letters. During the 30-day consultation period, the YSMN requested consultation on the Project. On June 8, Dr. Kristen Tuosto, a Tribal Representative, requested archaeological presence/absence testing be done first prior to Project implementation, to ensure there are no sensitive resources within the Project footprint. CRM TECH conducted the archaeological presence/absence testing and the results (no significant resources were identified) are detailed in a report that is provided as **Appendix 4** to this Initial Study. Throughout the course of the

[1] Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

research procedures, no "historic properties" or "historical resources" were encountered in the APE. The only cultural resource found during the study was an isolated mano recovered approximately 180 centimeters below surface. It was recorded into the California Historical Resources Inventory under the temporary designation of Isolate 4390-1, pending assignment of a permanent identification number. Occurring out of an intact depositional context, however, the isolate does not constitute a potential "historic property"/"historical resource" and requires no further consideration under Section 106 or CEQA provisions. This information was provided to the Tribe, and their response was to request the implementation of several mitigation measures, including archaeological and tribal cultural monitoring, to ensure that no significant impacts to tribal cultural resources occur as a result of project implementation.



FIGURE 1

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Environmental Consultants

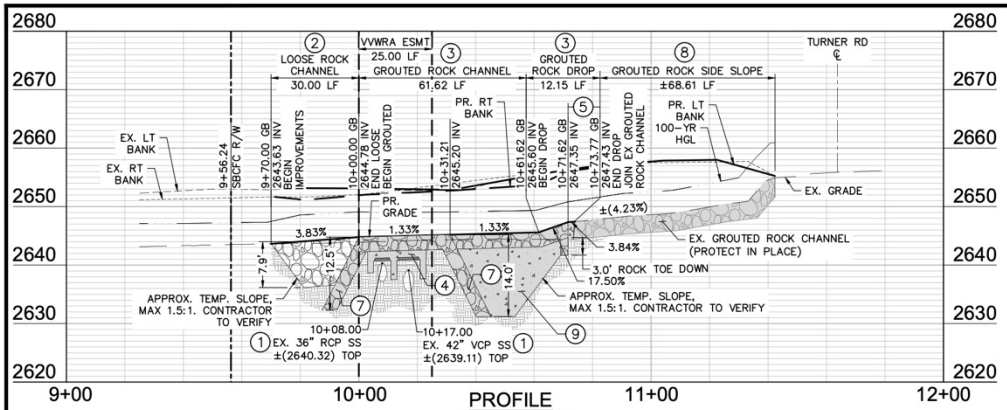
Regional Project Location

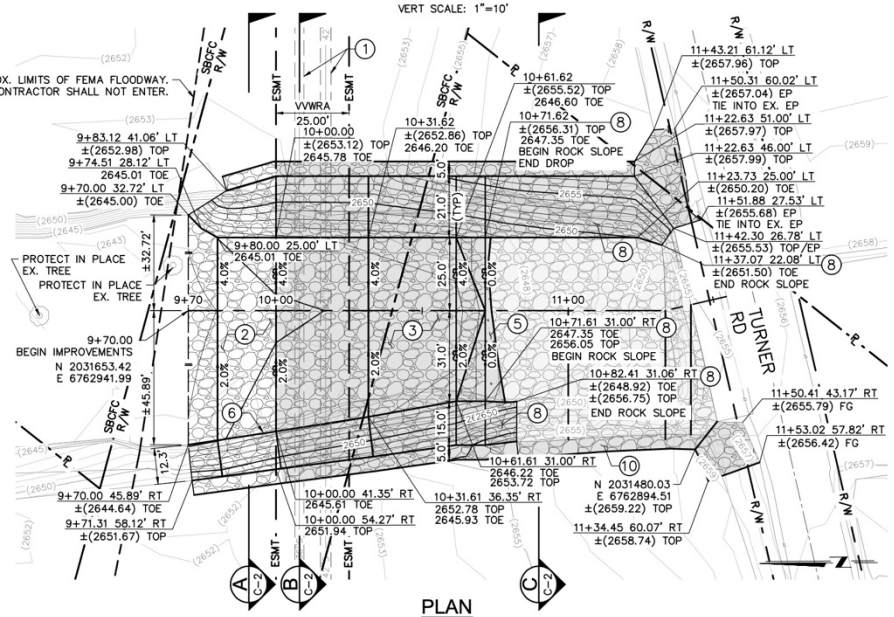


FIGURE 2

Tom Dodson & Associates
Environmental Consultants

Local Project Location





CONSTRUCTION NOTES

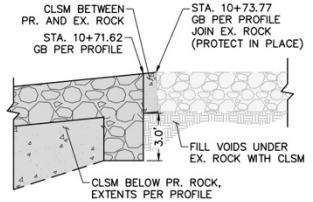
1. PROTECT IN PLACE EX. SEWER LINES AND PIPE BEDDING.
2. CONSTRUCT 2–TON LOOSE ROCK CHANNEL OVER 1–FT OF BACKING MATERIAL AND RSP FABRIC PER PLAN, PROFILE AND SECTION A, SHEET C–2. ROCK GRADATION PER GRADATION TABLE, THIS SHEET. ROCK THICKNESS PER SECTION A, SHEET C–2.
3. CONSTRUCT 2.5–FT THICK GROUTED ROCK CHANNEL PER PLAN AND PROFILE. WHERE ROCK IS NOT OVER CONCRETE OR SLURRY, INSTALL ROCK OVER 1–FT OF BACKING MATERIAL AND RSP FABRIC. ROCK GRADATION PER GRADATION TABLE, THIS SHEET.
4. CONSTRUCT CONCRETE SLAB PIPE PROTECTION OVER EX. SEWER PIPES PER S–1 THROUGH S–4.
5. INSTALL CLSM SLURRY BETWEEN PR. AND EX. ROCK PER DETAIL 1, THIS SHEET. PROVIDE SMOOTH TRANSITION BETWEEN EX. TOP OF ROCK AND PROPOSED TOP OF ROCK. CONTRACTOR SHALL ENSURE ALL VOIDS ARE FILLED AT CONNECTION WITH EX. ROCK.
6. REMOVE AND PROPERLY DISPOSE OF EX. TREE AND ROOTBALL.
7. CONSTRUCT ROCK TOE DOWN PER DETAIL 2, SHEET C–2. DEPTH PER PROFILE.
8. CONSTRUCT GROUTED ROCK SIDE SLOPE PER SECTION C AND DETAIL 1, SHEET C–2.
9. INSTALL CLSM SLURRY BACKFILL WITHIN EXCAVATION LIMITS. PROVIDE WEEP TUBES THROUGH SLURRY AS NEEDED PER DETAIL 2, SHEET C–2.
10. CONSTRUCT 2.5–FT THICK 300–LB GROUTED ROCK SHOULDER ALONG EDGE OF EX ROCK SLOPE. DIMENSIONS PER PLAN. MATCH EX. ELEVATIONS.

LEGEND:

EX. GROUTED ROCK
PR. GROUTED ROCK
PR. LOOSE ROCK
PR. CLSM
GEOFOAM

HYDRAULIC DATA		
STATION	Q (CFS)	V (FPS)
9+70.00 TO 10+00.00	4876	17.30
10+00.00 TO 10+61.62	4876	22.14
10+61.62 TO 10+71.62	4876	23.54
10+71.62 TO 11+42.18	4876	22.37

GRADATION TABLE			
CLASS	D50 (IN)	W50	ROCK T (FT)
I	6	20–LB	1.0
IV	15	300–LB	2.5
IX	36	2–TON	4.5



NOTES:

1. CONTRACTOR SHALL THOROUGHLY CLEAN EX. GROUTED ROCK. APPLY BONDING AGENT TO EX. ROCK PRIOR TO INSTALLING SLURRY BACKFILL. BONDING AGENT SHALL BE SIKADUR–32–HI–MOD–LPL OR APPROVED EQUAL.

EXISTING AND PROPOSED CONNECTION DETAIL 1
NOT TO SCALE

NOTES:

1. CONTRACTOR SHALL CLEAR AND GRUB AS NEEDED WITHIN GRADING LIMITS.
2. CONTRACTOR SHALL PROTECT ALL EX. IMPROVEMENTS AND UTILITIES, UNLESS OTHERWISE NOTED ON PLANS. CONTRACTOR SHALL VERIFY DEPTH, SIZE, LOCATION OF EXISTING UTILITIES PRIOR TO CONSTRUCTION AND NOTIFY ENGINEER OF ANY CONFLICTS OR DISCREPANCIES. CONTRACTOR SHALL PROTECT IN PLACE ALL EXISTING UTILITIES, UNLESS OTHERWISE NOTED.

GRAPHIC SCALE
0 20' 40'
SCALE: 1" = 20'

100% PROGRESS SET
NOT FOR CONSTRUCTION

REV	DESCRIPTION	ENGR	DATE	APPD	DATE

PROGRESS: 100% DESIGN
SUBMITTAL DATE: 10/07/2025
PROJECT MANAGER: JO
DESIGNED BY: JO/JC
DRAWN BY: DB
CHECKED BY: NR

DRAFT

PLANS PREPARED BY:
DUDEK
605 Third Street Encinitas, CA 92024
760.942.5147 Fax 760.632.0164

VICTOR VALLEY WASTEWATER RECLAMATION AUTHORITY

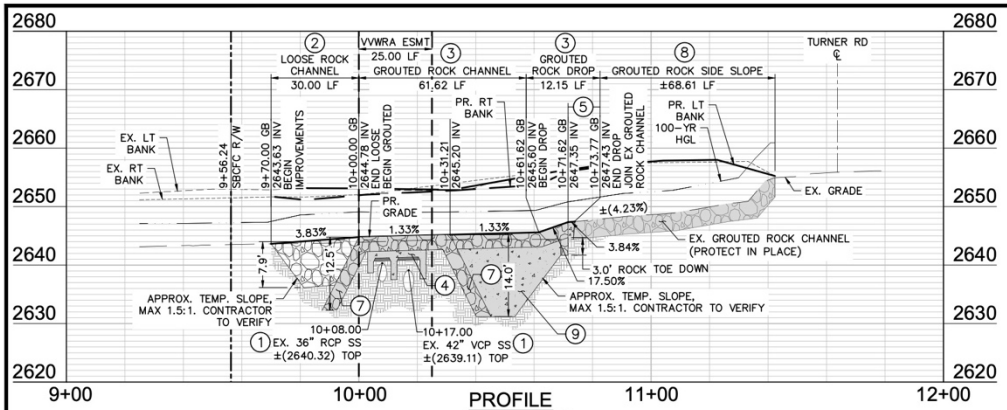
VICTOR VALLEY WASTEWATER RECLAMATION AUTHORITY
OSSUM WASH REPAIR PROJECT
CHANNEL PLAN & PROFILE

C–1
PROJECT NO. 17390
SHT. NO. 3 OF 8

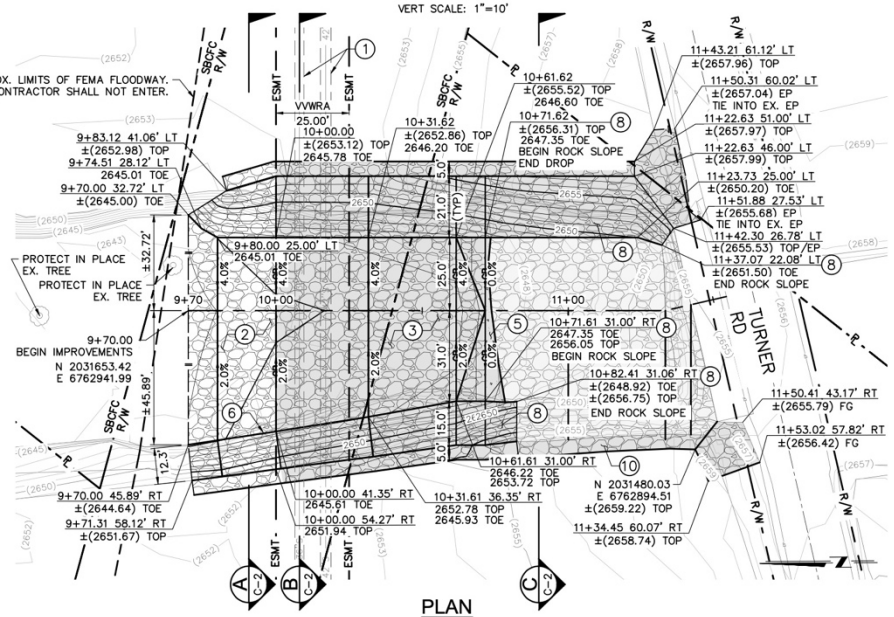
FIGURE 3

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Environmental Consultants

Channel Plan & Profile



PROFILE
HORIZ SCALE: 1"=20'
VERT SCALE: 1"=10'



PLAN
SCALE: 1"=20'

CONSTRUCTION NOTES

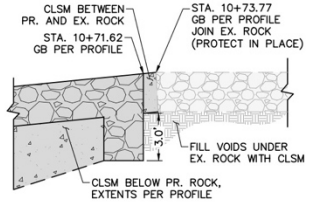
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GEOFOAM

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IX	36	2–TON	4.5



NOTES:
1. CONTRACTOR SHALL THOROUGHLY CLEAN EX. GROUTED ROCK. APPLY BONDING AGENT TO EX. ROCK PRIOR TO INSTALLING SLURRY BACKFILL. BONDING AGENT SHALL BE SIKADUR–32–HI–MOD–LPL OR APPROVED EQUAL.

EXISTING AND PROPOSED CONNECTION DETAIL 1
NOT TO SCALE

NOTES:

1. CONTRACTOR SHALL CLEAR AND GRUB AS NEEDED WITHIN GRADING LIMITS.
2. CONTRACTOR SHALL PROTECT ALL EX. IMPROVEMENTS AND UTILITIES, UNLESS OTHERWISE NOTED ON PLANS. CONTRACTOR SHALL VERIFY DEPTH, SIZE, LOCATION OF EXISTING UTILITIES PRIOR TO CONSTRUCTION AND NOTIFY ENGINEER OF ANY CONFLICTS OR DISCREPANCIES. CONTRACTOR SHALL PROTECT IN PLACE ALL EXISTING UTILITIES, UNLESS OTHERWISE NOTED.

GRAPHIC SCALE
0 20' 40'
SCALE: 1" = 20'

100% PROGRESS SET
NOT FOR CONSTRUCTION

REV	DESCRIPTION	ENGR	DATE	APPD	DATE

PROGRESS:	100% DESIGN
SUBMITTAL DATE:	10/07/2025
PROJECT MANAGER:	JO
DESIGNED BY:	JO/JC
DRAWN BY:	DB
CHECKED BY:	NR

DRAFT

PLANS PREPARED BY:
DUDEK
605 Third Street Encinitas, CA 92024
760.942.5147 Fax 760.632.0164

VICTOR VALLEY WASTEWATER RECLAMATION AUTHORITY

VICTOR VALLEY WASTEWATER RECLAMATION AUTHORITY
OSSUM WASH REPAIR PROJECT
CHANNEL PLAN & PROFILE

C–1
PROJECT NO. 17390
SHT. NO. 3 OF 8

FIGURE 4

Tom Dodson & Associates
Environmental Consultant

Channel Plan & Profile (page 2)



FIGURE 5

Tom Dodson & Associates
Environmental Consultants

Hydraulic Work Map

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☒ 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	☒ Tribal Cultural Resources
☐ Utilities & Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

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

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

Tom Dodson & Associates
Prepared by

08/17/26
Date

Latif Lasri
Lead Agency (signature)

8/18/2026
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

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

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously

prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
I. **AESTHETICS**: Except as provided in Public Resources Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In 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 or 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?	☐	☒	☐	☐

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The Project area is located within the Ossum Wash and will add grouted and ungrouted rip-rap along the channel bank and over the two sewer pipelines to be protected. The Project site is a desert wash located south of the Mojave River. The surroundings lands are generally vacant with isolated residences at distance from the Project site. Much of the surrounding land is zoned for Exclusive Agriculture but, with the exception of the area to the west of Ossum Wash, does not support ongoing agriculture at this time. The Mojave River is located southeast, east, and northeast of the site with rolling hills farther to the east.

Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. The Project site is vacant containing vegetation that is typical of the high desert within which the Project is located (i.e., Victor Valley). A review of the Project area determined that there are no scenic vistas within the Project site other than typical high desert wash and desert scrub. The planned improvements would not be visible to the public or from any publicly accessible roadways.

A scenic vista impact can also occur when a scenic vista can be viewed from the Project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. As stated above, the proposed Project is located in an area generally surrounded by vacant land, or scattered residential uses. To the north and at a lower elevation is the Mojave Riverbed which contains native vegetation, but is not generally accessed by the public. The Ossum Wash is relatively

bare of vegetation after recent storm events but does support some native desert vegetation during times in between scouring storms.

The Project proposes to install rip-rap along small portions the wash to protect the two underground sewer lines. The general area has scenic views or vistas of the Mojave River and hills to the east, and the San Bernardino and San Gabriel Mountains much further to the south during clear days. Given the disturbed nature of the overall Project area, no scenic vistas have been identified that would be impacted by the planned wash improvements. Therefore, the proposed Project would have a less than significant potential to impact a scenic vista. No mitigation is required.

b. *No Impact* – The Project footprint does not contain any scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway corridor. No scenic resources, such as historical buildings, trees, or rock outcropping, would be removed, altered, or obstructed as part of the proposed Project. Refer to **Figure I-1,** which depicts that the proposed Project is not located within a scenic highway as designated by Caltrans. The Project site is a portion of an incised desert wash subject to periodic flooding during heavy storms. The planned improvements include grouted and ungrouted rip-rap (i.e., small to medium-sized rocks) to protect the wash slopes and cover of the two sewer pipelines that cross the wash. The site is vacant with scattered native vegetation, although the wash itself has been scoured of vegetation from recent storm activity. Given that no other known scenic resources exist within or adjacent to the Project site, there is no potential to substantially damage scenic resources within a state scenic highway corridor. No mitigation is required.

c. *No Impact* – The Project is located within the rural desert in proximity to the Mojave River within the northern portion of the City of Victorville. According to the California Office of Land Use and Climate Innovation's (LCI) Site Check,[2] the Project is not located within an Urbanized Area or Urban Cluster under the Census, but is located within the Urbanized Area as designed in Public Resources Code (PRC) 21071 and Urban Area as defined in PRC 21094.5. The surrounding area contains a few individual residences, but is otherwise surrounded by vacant land and the Mojave River. The area surrounding the Project is sparsely populated and mostly vacant that mainly supports desert vegetation. As a result, there would be no impacts to the visual character and quality of public views of the site. Further, the proposed Project falls outside of the jurisdiction the City's zoning code or other regulations governing scenic quality. Thus, with the limited improvements proposed to the Ossum Wash to protect the underground sewer pipelines and minimize channel erosion, no conflicts with any scenic regulations have been identified. Thus, the proposed Project would no impact under this issue.

d. *Less Than Significant With Mitigation Incorporated* – The construction activities are limited to daylight hours unless an emergency occurs, and the amount of security lighting needed during construction will be minimal. The Project is surrounded by mainly vacant land with only a few residences and the Mohave Desert supported in the area. The construction activities are limited to daylight hours unless an emergency occurs. However, if nighttime construction is required it could contribute to ambient light and could adversely affect views in the area at night, which could result in a significant light and/or glare impact. Thus, mitigation (Mitigation Measure [**MM] AES-1**) is

[2] LCI, 2026. Site Check. https://sitecheck.lci.ca.gov/ (Accessed 07/08/26)

required to ensure that no lighting intrudes into sensitive areas and to ensure directing light and shielding is used to minimize off-site illumination.

AES-1 ***The Project shall implement at least the following measures, unless they conflict with the local jurisdiction's light requirements, in which case the local jurisdiction's requirements shall be enforced:***

- ***Use of low-pressure sodium lights where security needs require such lighting to minimize impacts of glare.***
- ***The height of lighting fixtures shall be lowered to the lowest level consistent with the purpose of the lighting to reduce unwanted illumination.***
- ***Directing light and shielding shall be used to minimize off-site illumination during both construction of the Project.***
- ***No light shall be allowed to intrude into sensitive light receptor areas during both construction of the Project.***
- ***Non-reflective materials and/or coatings shall be used on the exterior of all facilities if constructed in a publicly visible location (such as from a roadway or public facility).***

There are no nearby residences or sensitive uses that would be significantly impacted by light or glare in the vicinity of the Project site one the Project is operational, as no light would be generated by the Project, and no sources of glare would be installed as part of the Project. Therefore, it is not anticipated that the site would create any new permanent sources of light or glare during operation. However, the implementation of **MM AES-1** would ensure that light and glare impacts from the Project are minimized to a level of less than significant.

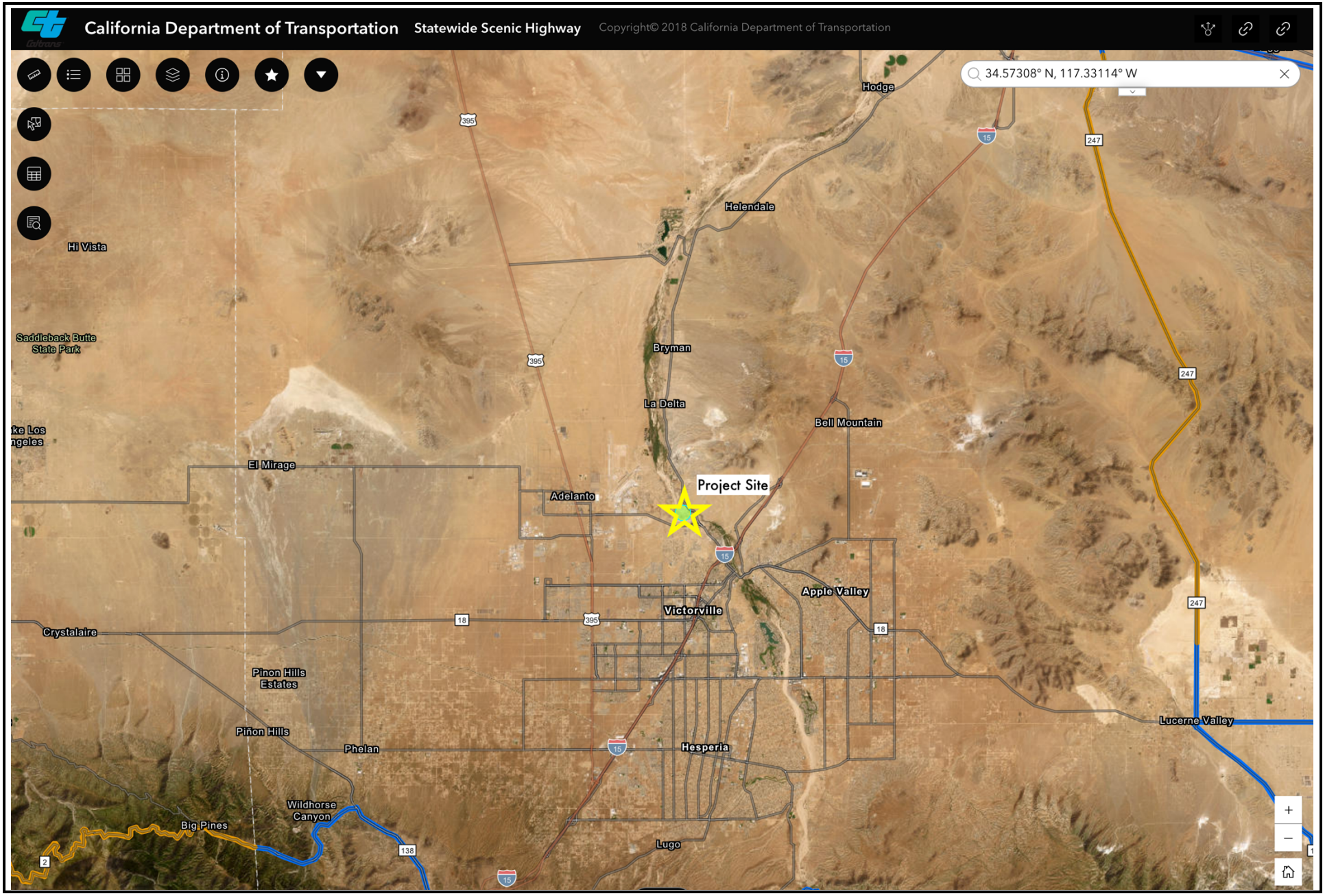


FIGURE I-1

Tom Dodson & Associates
Environmental Consultant

Scenic Highway Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to 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?	☐	☐	☒	☐

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The proposed Project is located within a site designated for Open

Space and zoned for Exclusive Agriculture (A-E). The surrounding lands are similarly designated for Open Space, Specific Plan, and Low Density Residential and zoned for Exclusive Agriculture (A-E), Specific Plan, and Single Family Residential (R1-T)(see previous Table 3). According to the California Department of Conservation California Important Farmland Finder, the Project site is located within an area designated as "Grazing Land" (**Figure II-1**). Grazing land is not a type of Prime Farmland, Unique Farmland or Farmland of Statewide Importance. Furthermore, given the Project's location within an established drainage feature—the Ossum Wash—there is no potential to utilize this site for grazing land at this time. As such, no adverse impact to any agricultural resources would occur from implementing the proposed Project. No mitigation is required.

b. *Less than Significant Impact* – The Project site is an active wash and there are no agricultural uses currently on the Project site or on adjacent properties. The Project site is zoned for Exclusive Agriculture (A-E) use, and the land use designation is Open Space. Furthermore, the proposed Project is not located on a site that contains any Williamson Act contracts. While the Project site is zoned for A-E use, the continued flow of the Ossum Wash would occur with or without the proposed Project improvements. As a result, regardless of the Project improvements, the Ossum Wash would continue to exist as a source of flow to the Mojave River. Thus, the proposed improvements to the wash to mitigate the risk of pipe exposure and damage would not impact the potential for this parcel or any other adjacent parcel to be utilized for agricultural purposes pursuant to the A-E zoning classification. Therefore, there is a less than significant potential for a conflict between the proposed Project and agricultural zoning or Williamson Act contracts within the Project area. No mitigation is required.

c. *No Impact* – Please refer to sections II(a) and II(b) above. The Project site is zoned for Exclusive Agriculture (A-E) use and the land use designation is Open Space. The site and surrounding land do not contain significant stands of trees that could be used for timber or similar uses. None of the land uses or zoning classifications support forest land or timberland uses or designations. Therefore, no potential exists for a conflict between the proposed Project and forest/timberland zoning. No mitigation is required.

d. *No Impact* – There are no forest lands within the Project area because the Project area is a desert wash surrounded by desert land and located in the high desert. No potential for loss of forest land would occur if the Project is implemented. No mitigation is required.

e. *Less Than Significant Impact* – Though the proposed Project site is zoned for Exclusive Agriculture use, the Project site does not currently support either agricultural or forestry uses. Furthermore, because the Project site will be utilized for specific stream bank improvements to protect flood control facilities, which is considered a "Facility" use that is conditionally allowed under the Exclusive Agriculture zoning classification (flood control or flood protection facilities), the proposed improvements would not result in conversion of farmland to alternative use. As stated under issue II(b), above, the proposed improvements to the wash to mitigate the risk of pipe exposure and damage would not impact the potential for this parcel or any other adjacent parcel to be utilized for agricultural purposes pursuant to the A-E zoning classification. As such, implementation of the proposed Project is anticipated to have a less than significant potential to cause or result in the conversion of farmland or forest land to alternative use. No adverse impact would occur. No mitigation is required.

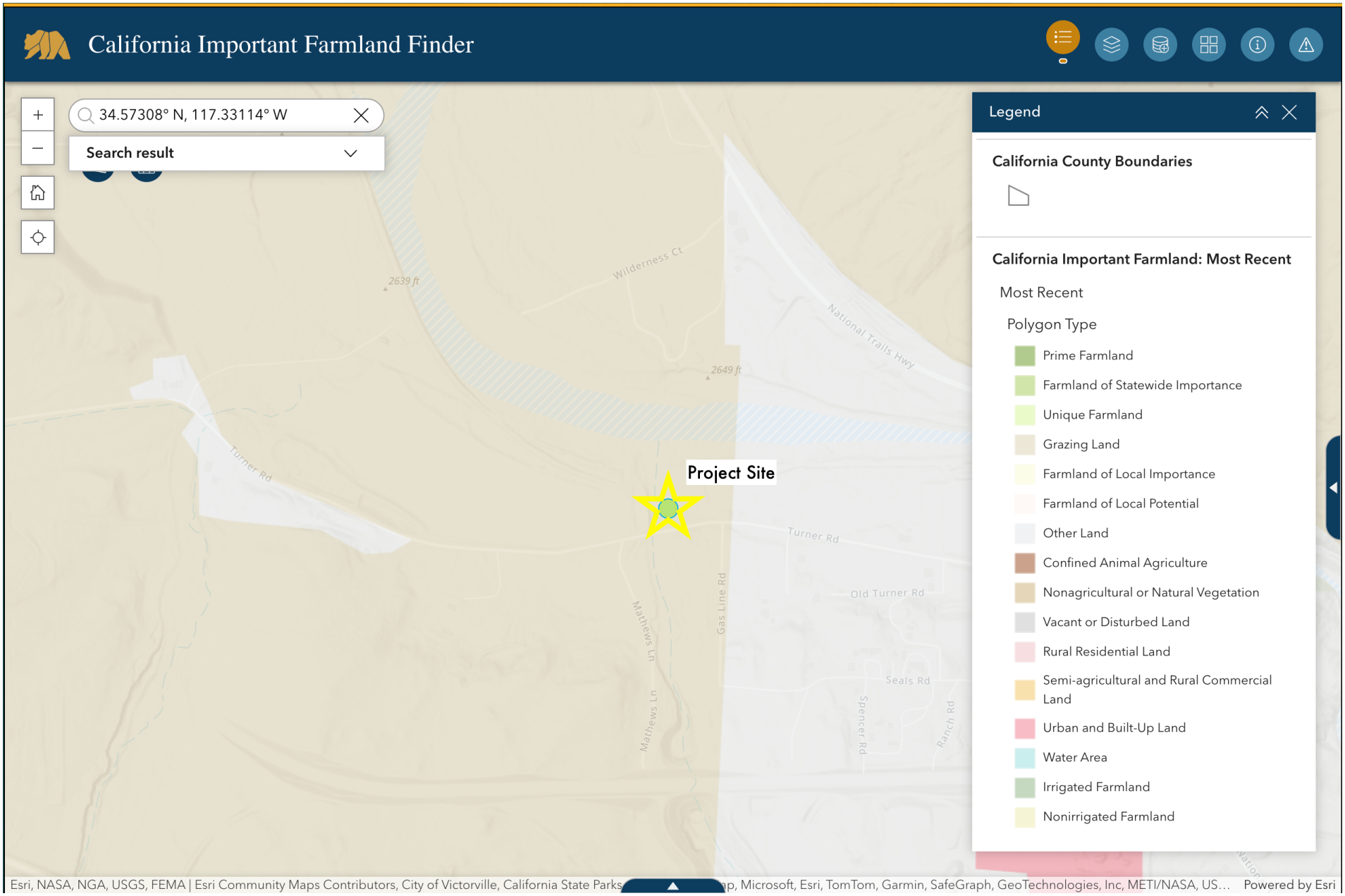


FIGURE II-1

Tom Dodson & Associates
Environmental Consultant

Important Farmland Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Ossum Wash Repair Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated June 22, 2026. This AQGGA is provided as **Appendix 2** to this Initial Study.

Background

The Project site is located in the portion of the County of San Bernardino, California, that is part of the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The air quality assessment for the Project evaluates emissions impacts associated with short-term construction and long-term operation of the Project. A number of air quality modeling tools are available to assess the air quality impacts of projects. In addition, certain air districts, such as the MDAQMD, have created guidelines and requirements to conduct air quality analyses. The MDAQMD's current guidelines, included in its *California Environmental Quality Act and Federal Conformity Guidelines* (August 2016), were adhered to in the assessment of air quality impacts for the Project.

Climate

Air quality in the Project area is not only affected by various emissions sources (mobile, industry, etc.) but is also affected by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall.

The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains within the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are

due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in Southern California by differential heating are channeled through the MDAB. The MDAB is separated from the Southern California coastal and Central California valley regions by mountains (highest elevation is approximately 10,000 feet), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 feet). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 feet) between the San Bernardino and San Jacinto Mountains.

During the summer, the MDAB is generally influenced by a Pacific subtropical high cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The MDAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. The MDAB averages between three and seven inches of precipitation per year (from 16 to 30 days with at least 0.01 inch of precipitation). The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate that at least three months have maximum average temperatures over 100.4° F.

Snow is common above 5,000 feet in elevation, resulting in moderate snowpack and limited spring runoff. Below 5,000 feet, any precipitation normally occurs as rainfall. Pacific storm fronts normally move into the area from the west, driven by prevailing winds from the west and southwest. During late summer, moist high-pressure systems from the Pacific collide with rising heated air from desert areas, resulting in brief, high-intensity thunderstorms that can cause high winds and localized flash flooding

Applicable Regulatory Requirements

MDAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

MDAQMD Rule 403

The purpose of this rule is to reduce the amount of PM_{10} entrained in the ambient air from anthropogenic fugitive dust sources within the MDAQMD by requiring actions to prevent, reduce, or mitigate fugitive dust. The following measures shall be incorporated into Project plans and specifications as implementation of Rule 403.

- Use periodic watering for short-term stabilization of Disturbed Surface Area to minimize visible fugitive dust emissions. For purposes of this Rule, use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient to maintain compliance.
- Take actions sufficient to prevent Project-related trackout onto paved surfaces.

MDAQMD Rule 1113

The purpose of this rule is to limit the quantity of volatile organic compounds (VOC) in architectural coatings. The following measures shall be incorporated into Project plans and specifications as implementation of MDAQMD Rule 1113.

- Only "Low-VOC" paints consistent with MDAQMD Rule 1113 shall be used.

Methodology

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality and greenhouse gas emissions.

Air Quality Regional Emissions Thresholds

The MDAQMD has developed regional significance thresholds for criteria pollutants, as summarized at Table III-1. The MDAQMD's *CEQA and Federal Conformity Guidelines* indicate that any projects in the MDAB with daily regional emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table III-1: Maximum Daily Regional Emissions Thresholds

Pollutant	Regional Thresholds
NO_X	137 lbs/day
VOC	137 lbs/day
PM_{10}	82 lbs/day
$PM_{2.5}$	65 lbs/day
SO_X	137 lbs/day
CO	548 lbs/day

lbs/day = Pounds Per Day

Impact Analysis

a. *Less Than Significant Impact* – The Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the Mojave Desert set forth a comprehensive set of programs that will lead the MDAB into compliance with federal and state air quality standards. The control measures and related emission reduction estimates within the Federal Particulate Matter Attainment Plan and Ozone Attainment Plan are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with these attainment plans for development projects is determined by demonstrating compliance the indicators discussed below:

Consistency Criterion No. 1

Local land use plans and/or population projections

The City of Victorville designates the Project site as "Open Space (OS)" land uses and "Exclusive Agricultural (A-E)" zoning uses. The OS designation refers to land that is to remain undeveloped due to severe development constraints, lake or river bodies and floodplains; and reserved public open space in parks, golf courses, or other lands with an open space that protect public safety and/or conserve public resources. The AE designation is intended to protect agricultural areas from urban development or residential subdivision, and to serve as an open space area.

The proposed Project primarily involves construction activities associated with improvements to support VVWRA's regional wastewater conveyance system, including installation of grouted riprap on the channel side slope along the easterly side of the existing grouted riprap channel, extension of the grouted riprap channel from the downstream end of the existing grouted riprap to the northern extent of the VVWRA pipeline easement, and installation of a loose riprap lined channel downstream of the proposed grouted riprap. It should be noted that the proposed development would not exceed regional thresholds for operational emissions and would therefore be considered to have a less than significant impact. As such, the development proposed by the Project is consistent with the growth projections in the General Plan and is therefore considered to be consistent with the Air Quality Management Plan (AQMP).

On the basis of the preceding discussion, the Project is determined to be consistent with the AQMP and a less than significant impact is expected.

Consistency Criterion No. 2

All MDAQMD Rules and Regulations

The Project would be required to comply with all applicable MDAQMD Rules and Regulations, including, but not limited to Rules 401 (Visible Emissions), 402 (Nuisance), 403 (Fugitive Dust), and 1113 (Architectural Coatings). As previously stated, the Project would implement MDAQMD Rule 403 and MDAQMD Rule 1113.

Consistency Criterion No. 3

Demonstrating that the project will not increase the frequency or severity of a violation in the federal or state ambient air quality standards

As substantiated herein, Project construction and operational-source emissions would not exceed applicable MDAQMD significance thresholds. As such, the Project would not have the potential to increase the frequency or severity of a violation in the federal or state ambient air quality for on-going Project operations.

AQMP Consistency Conclusion

The Project's proposed land uses are consistent with the General Plan land use and zoning designation and the Project would not exceed the applicable regional thresholds during construction or operations for emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Therefore, the Project is considered to have a less than significant impact. The Project is therefore considered to be consistent with the AQMP and impacts under this issue are considered less than significant.

b. *Less Than Significant Impact* – The MDAQMD relies on the South Coast Air Quality Management District (SCAQMD) guidance for determining cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the SCAQMD clearly states (Page D-3):

"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for Project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which MDAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual Project-related construction and operational emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable.

Construction Activities

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

Vertical Construction

- Site Preparation
- Grading

Grading Activities

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Based on information provided by the Project applicant, the Project would require approximately 2,250 cubic yards of export for earthwork activities.

On Road Trips

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. The number of worker, vendor, and hauling trips per phase is presented below in Table III-2, and are based on information provided by the client and CalEEMod defaults.

Table III-2: Construction Trip Assumptions

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Site Preparation	5	0	0
Grading	10	16	18

Construction Duration

For purposes of analysis, construction of the Project is expected to commence in February 2027 and would last through March 2027. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[3] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*.

Table III-3: Construction Duration

Construction Activity	Start Date	End Date	Days
Site Preparation	3.87	4.52	0.01
Grading	2/1/2027	2/19/2027	15

Construction Equipment

Equipment used for vertical and linear construction of the Project at either site is shown in Table III-4.

Table III-4: Construction Equipment

Construction Activity	Equipment	Quantity	Hours
Site Preparation	Excavators	1	8
Site Preparation	Tractors/Loaders/Backhoes	1	8
Grading	Off-Highway Trucks	3	8
Grading	Rollers	1	8

Regional Construction Emissions Summary

The estimated maximum daily construction emissions without mitigation are summarized in Table III-5. Under the assumed scenarios, emissions resulting from Project construction would not exceed thresholds established by the MDAQMD for emissions of any criteria pollutant. Project construction-source emissions impacts would therefore be less-than-significant. Detailed construction model outputs are presented in Appendix 1 to the AQGGA.

[3] As shown in the CalEEMod User's Guide Version 2022, Appendix G "Table G-11. Statewide Average Annual Offroad Equipment Emission Factors" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Table III-5: Regional Construction Emissions Summary

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Winter						
2027	1.54	10.07	10.88	0.05	0.92	0.45
Maximum Daily Emissions	1.54	10.07	10.88	0.05	0.92	0.45
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Regional Operational Emissions

The proposed Project primarily involves construction activities associated with improvements to support VVWRA's regional wastewater conveyance system, including installation of grouted riprap on the channel side slope along the easterly side of the existing grouted riprap channel, extension of the grouted riprap channel from the downstream end of the existing grouted riprap to the northern extent of the VVWRA pipeline easement, and installation of a loose riprap lined channel downstream of the proposed grouted riprap.

Long-term air quality impacts would occur from mobile-source emissions associated with Project-related operational traffic and from emissions associated with energy usage. For ongoing operations, the Project is not anticipated to require additional operational staff, and existing VVWRA personnel would be trained to the required level of certification. As such, operational activities would be limited to routine maintenance and monitoring, and operational emissions are anticipated to be less than significant.

Conclusion

The development of the Project would have a less than significant potential to 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. *No Impact* – The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors.

As per the MDAQMD's *Guidelines*, the following Project types located within a specified distance to an existing or planned sensitive receptor land use must be evaluated to determine exposure of substantial pollutant concentrations to sensitive receptors:

- 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's land uses do not include the above uses. As such, no analysis for sensitive receptors is required. Additionally, results of the regional analysis indicate that the Project will not

exceed the MDAQMD significance thresholds during construction or operations. Therefore, sensitive receptors would not be subject to a significant air quality impact during Project construction and operational activities. No impacts under this issue are anticipated.

d. *Less Than Significant Impact* – Substantial odor-generating sources include land uses such as Agricultural uses (livestock and farming), Wastewater treatment plants, Food processing plants, Chemical plants, Composting operations, Refineries, Landfills, Dairies, and Fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with MDAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

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

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from a Biological Resources Assessment prepared by HDR, dated August 5, 2026. This report is titled *Biological Resources Assessment & Aquatic Resources Delineation Technical Report Ossum Wash Repair Project,* and is provided as **Appendix 3** to this Initial Study.

General Setting

The Project Area is in the western portion of the Mojave Desert, along the west side of the Mojave River. The Victorville area is subject to both seasonal and annual variations in temperature and precipitation. Average annual maximum temperatures peak at 98.1 degrees Fahrenheit (° F) in July and fall to an average annual minimum temperature of 29.2° F in January. Average annual precipitation is greatest from

November through March and reaches a peak in February (1.05 inches). Precipitation is lowest in the month of June (0.04 inches). Annual total precipitation averages 5.52 inches.

The topography of the Project Area is relatively flat on the eastern side to hilly on the western side. Elevation within the proposed Project Area ranges from approximately 2,658 feet above mean sea level (amsl) near the Turner Road to 2,646 feet amsl near the Mojave River.

Hydrologically, the Project Area is situated within an unnamed Hydrologic Sub-Area (HSA 628.20). This HSA comprises a 556,821-acre drainage area, within the larger Mojave Watershed (HUC 18090208). The Mojave River is the major hydrogeomorphic feature within the Mojave Watershed.

Soils within the Project Area are comprised of Villa loamy sand, 0 to 5 percent slopes consisting of sand and gravelly sand comprised of alluvium derived from granite sources and are somewhat excessively drained with a high to very high runoff class.

Land use within the Project Area and surrounding vicinity consists of the Mojave River floodplain to the north, agricultural/graded lands to the west, open space to the south, and rural residential and industry to the east. The project area is characterized by a predominantly unvegetated sandy wash with remnant Cottonwood trees (*Populus fremontii*). The area outside the area of potential effects (APE) is characterized by disturbed Atriplex canescens Shrubland Alliance (fourwing saltbush scrub), Larrea tridentata Shrubland Alliance (*creosote bush scrub*).

Vegetation

Habitat within the Project Area (north of Turner Road) consists of a sparse covering of mixed four-wing saltbush scrub/creosote bush scrub and graded bare ground, with some graded bare ground near the confluence of Ossum Wash and the Mojave River. Habitat within the adjacent Mojave River floodplain. The Project site is bordered on the north by unvegetated sandy river wash.

Wildlife

No amphibian species were observed or otherwise detected within the Project Area. The only reptiles observed within the Project Area was Great Basin whiptail (*Aspidoscellis tigris tigris*) and western side-blotched lizard (*Uta stansburiana elegans*). Other common herp species expected to occur within the Project Area include western zebra-tailed lizard (Callisaurus draconoides rhodostictus), red racer (*Coluber flagellum piceus*), northern Mohave rattlesnake (*Crotalus scutulatus scutulatus*), and southern desert horned lizard (*Phrynosoma platyrhinos calidiarum*).

Birds

Birds were the most observed wildlife group during survey and species observed or otherwise detected in the Project Area during the reconnaissance-level survey included:

- Gambel's quail (*Callipepla* gambelii)
- common raven (*Corvus corax*)
- American kestrel (*Falco sparverius*)
- house finch (*Haemorhous mexicanus*)
- Say's phoebe (*Sayornis saya*)
- European starling (*Sturnus vulgaris*)

Mammals

Identification of mammals within the Project Area was generally determined by physical evidence rather than direct visual identification. This is because 1) many of the mammal species that potentially occur onsite are nocturnal and would not have been active during the survey and 2) no mammal trapping was performed. Mammal species observed or otherwise detected during the survey included white-tailed antelope squirrel (*Ammospermophilus leucurus*), black-tailed jackrabbit (*Lepus californicus*) and desert cottontail (*Sylvilagus audubonii*). Other common species expected to occur within the Project Area include coyote (*Canis latrans*), Merriams' kangaroo rat, (*Dipodomys merriami*and California ground squirrel (*Otospermophilus beecheyi*).

Special-Status Species and Habitats

Per the Information for Planning and Consultation System (IPaC), California Natural Diversity Database (CNDDB), California Native Plant Society Electronic Inventory (CNPSEI), and other relevant literature and databases, 39 sensitive species (10 plant species, 29 animal species) have been documented in the Victorville USGS 7.5-Minute Series Quadrangles. This list of sensitive species includes any State and/or federally listed threatened or endangered species, California Fully Protected species, California Department of Fish and Wildlife (CDFW) designated Species of Special Concern (SSC), and otherwise Special Animals. "Special Animals" is a general term that refers to all the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. This list is also referred to as the list of "species at risk" or "special status species." The CDFW considers the taxa on this list to be those of greatest conservation need.

Of the 11 State and/or federally listed or Candidate species identified by the database queries as potentially occurring within the region, only the following three State and/or federally listed species have been documented in the Project vicinity (within approximately 3 miles):

- Mojave desert tortoise (*Gopherus agassizii*)
- least Bell's vireo (*Vireo bellii pusillus*)
- Mohave ground squirrel (*Xerospermophilus mohavensis*)
- Crotch's Bumble Bee (*Bombus crotchii*)
- Monarch Butterfly (*Danaus plexippus*)

Additionally, the State and federally listed as endangered southwestern willow flycatcher (*Empidonax traillii extimus*) has not been documented in the Project vicinity, but there is USFWS designated Critical Habitat for this species adjacent the Project site to the east. Therefore, this species will be included in the discussion below.

Although not a State or federally listed species, the burrowing owl (*Athene cunicularia*) is a CDFW California Endangered Species Act (CESA) candidate for listing and is considered particularly sensitive species within the region. Furthermore, this species has been documented within 1 mile of the Project site and there is potentially suitable habitat for BUOW within the Project vicinity. Therefore, this species will also be included in the discussion below.

An analysis of the likelihood for occurrence of all CNDDB sensitive species documented in the *Victorville, Victorville NW, Helendale* and *Adelanto* quads is provided in Table 1 found in **Appendix 3**. This analysis considers species' range as well as documentation within the vicinity of the Project Area and includes the

habitat requirements for each species and the potential for their occurrence on site, based on required habitat elements and range relative to the current site conditions.

Mohave Desert Tortoise – Threatened (Federal)/Endangered (State)

The Mojave desert tortoise is a federally listed threatened species, and is a listed endangered species by the State. The species had experienced significant population declines throughout much of its range prior to becoming listed as threatened under the federal ESA in 1990. The Mojave desert tortoise has continued to decline throughout its range due to threats that include habitat loss, degradation and fragmentation, domestic grazing, predation, collections, and increased mortality rates. The Mojave desert tortoise is primarily found in creosote bush scrub and creosote bush scrub alliances, but is also occurs in other desert scrub habitats including succulent scrub, cheesebush scrub, blackbush scrub, hop-sage scrub, shadscale scrub, microphyll woodland, Joshua tree woodland and Mojave saltbush-allscale scrub plant communities. Desert tortoise primarily forage on annual forbs, but also perennials (e.g., cacti and grasses). They prefer surfaces covered with sand and fine gravel versus course gravel, pebbles, and desert pavement. Friable soil is important for digging burrows. Desert tortoise are most often found on level or sloped ground where the substrate is firm but not too rocky. Tortoise burrows are typically found at the base of shrubs, in the sides of washes and in hillsides. Because a single tortoise may have many burrows distributed throughout its home range, it is not possible to predict exact numbers of individuals on a site based upon burrow numbers.

> Findings: Per the USFWS desert tortoise Critical Habitat overlay, the Project site is not within any USFWS designated desert tortoise Critical Habitat. Some of the mixed four-wing saltbush scrub/creosote bush scrub habitat within and adjacent the western half of the Project site is marginally suitable for desert tortoise.
>
> The result of the protocol desert tortoise survey was that no evidence of desert tortoise presence was found in the survey area. No desert tortoise individuals or sign including desert tortoise burrows, scat, carcasses or other sign were observed. Therefore, Mojave desert tortoise are considered absent from the Project Area at the time of survey and the Project is not likely to adversely affect this species.

Southwestern Willow Flycatcher – Endangered (Federal/State)

The State and federally listed as endangered southwestern willow flycatcher (SWFL) is a small passerine bird that has a grayish-green back and wings, whitish throat, a light gray-olive breast, and pale yellowish belly. This flycatcher is a neotropical migrant that breeds in the southwestern United States from mid-April to early-September. In the fall, it migrates south to its wintering grounds in portions of South America, Central America and Mexico. The SWFL breeds in dense riparian habitats (at least 0.25 acres in size and at least 30 feet wide) along rivers, streams, and other wetlands at elevations ranging from sea level to 8,500 feet. Plant species closely associated with the flycatcher include willows (Salix spp.), boxelder (*Acer negundo),* seepwillow (*Baccharis spp.*), with an overstory of cottonwood (*Populus fremontii*). Occupied habitat is generally dominated by shrubs and trees 13 to 23 feet or more in height, which provide dense lower and mid-story vegetation approximately 10 to 13 feet aboveground. This dense vegetation is often interspersed with open water, small openings, or sparse vegetation, creating a mosaic that is not uniformly dense.

A rapid decrease in the numbers of SWFL in California and other southwestern states prompted the

USFWS to designate it as a Category 1 candidate species in 1991. One year later in 1992, the California Fish and Game Commission listed the species as endangered, under CESA of 1970. On July 23, 1993 the SWFL was proposed for listing as endangered by the USFWS and was then listed as Federally endangered on February 27, 1995, under the Endangered Species Act (ESA) of 1973. The USFWS designated critical habitat for the species on July 22, 1997. This habitat included 18 units with a total of 599 miles of river in California, New Mexico, and Arizona. On May 11, 2001, the critical habitat designation from 1997 was struck down by the U.S. 10th Circuit Court of Appeals who required further economic analysis. A recovery plan was finalized by USFWS in March of 2003. Critical habitat designations for this species were re-proposed and finalized in June 2004.

Findings: Per the literature review, SWFL have not been documented in the Project vicinity and the only documented occurrence for this species within the 4-quad CNDDB query is approximately 7.3 miles southeast of the Project Area (CNDDB 2026). However, there is USFWS designated Critical Habitat for this species adjacent the Project site to the east, within the Mojave River floodplain. There is no suitable riparian habitat for SWFL present within the Project site and the Project is not likely to directly impact this species. There is some potentially suitable Fremont cottonwood forest and woodland riparian habitat adjacent the Project site to the east. However, the proposed Project has been designed to completely avoid impacting any riparian habitat (Figure 1).

There are ongoing disturbances from the existing flood control maintenance activities consist primarily of noise, and lack of suitable riparian habitat adjacent to the work area. Therefore, SWFL are not likely to occur within the Project Area and the Project is not likely to adversely affect this species.

Least Bell's Vireo – Endangered (Federal/State)

The least Bell's vireo (LBVI) is a State and federally listed endangered migratory bird species. This species is a small, olive-gray migratory songbird that nests and forages almost exclusively in riparian woodland habitats. LBVI nesting habitat typically consists of well-developed overstory, understory, and low densities of aquatic and herbaceous cover. The understory frequently contains dense sub-shrub or shrub thickets. These thickets are often dominated by plants such as narrow-leaf willow, mulefat, young individuals of other willow species such as arroyo willow or black willow, and one or more herbaceous species. LBVI generally begin to arrive from their wintering range in southern Baja California and establish breeding territories by mid-March to late-March.

LBVI was first proposed for listing as endangered by the USFWS on May 3, 1985, and was subsequently listed as federally endangered on May 2, 1986. Critical habitat units were designated by the USFWS on February 2, 1994 and included reaches of ten streams in six counties in southern California and the surrounding approximately 38,000 acres. The project area is not within USFWS designated critical habitat for this species.

Findings: Per the literature review, LBVI have been documented in suitable riparian habitat along the Mojave River within approx. 0.5-mile north of the Project area. There is no suitable riparian habitat for LBVI present within the Project site and the Project is not likely to directly impact this species. There is some potentially suitable Fremont cottonwood forest and woodland riparian habitat adjacent the Project site to the east. However, the proposed Project has been designed to completely avoid impacting any riparian habitat.

There is no suitable habitat within the Project area, and there is ongoing disturbances from flood control maintenance activities consist primarily grading and sediment removal. Therefore, LBVI are not likely to occur within the Project Area and the Project is not likely to adversely affect this species.

Mohave Ground Squirrel – Threatened (State)

The Mohave ground squirrel (MGS) is a State listed threatened species. This small, grayish, diurnal ground squirrel is endemic to 2 million hectares in the western Mojave Desert. It typically inhabits sandy soils of alkali sink and creosote bush scrub habitat. Mohave ground squirrel forage on leaves and seeds and aestivate/hibernate for long periods of the year. Plants documented as forage for this species include: fiddleneck (*Amsinckia tessellata*), allscale (*Atriplex canescens and A. polycarpa*), desert holly (*A. hymenelytra*), coreopsis (*Coreopsis sp.*), spiny hopsage (*Grayia spinosa*), winterfat (*Krascheninnikovia lanata*), wolfberry (*Lycium andersonii*), Joshua tree (*Yucca brevifolia*) and the seeds of Joshua tree. It is suspected that Mohave ground squirrel forage on the plant species with the highest water content available at the time.

Mohave ground squirrel populations have declined significantly throughout the species range since around 1980 and population distribution throughout its range is patchy, even within suitable habitat. Primary threats to Mohave ground squirrel populations include range contraction, habitat loss, degradation and fragmentation, climate change including increased severity and persistence of drought, and invasive species.

Findings: Although a focused Mohave ground squirrel trapping survey was not performed. During this survey a Mohave ground squirrel habitat suitability assessment was conducted on the proposed Project site and adjacent habitat. Although some Mohave ground squirrel forage plant species (*Atriplex spp. and Lycium sp.*) are present within the Project Area, the Project site is significantly disturbed and heavily impacted by non-native, invasive vegetation.

The Project site falls just within the historic range of the Mohave ground squirrel but is outside of any currently extant Mohave ground squirrel population areas or population linkages. The Project site is located outside of the Mohave ground squirrel Conservation Area set forth in the West Mojave Plan and is approximately 15 miles south of the nearest known MGS population area.

Per the literature review, the nearest documented Mohave ground squirrel occurrence (2007) is within approximately 1 mile northwest of the Project site. However, extensive live-trapping and camera-trapping surveys were conducted within the southern portion of the Mohave ground squirrel range from 1998 to 2012 and very few animals were detected, despite the presence of suitable habitat, indicating that Mohave ground squirrel has been extirpated from much of the southern portion of its range. Furthermore, the potential habitat for this species is highly fragmented within the Project vicinity and the Desert Renewable Energy and Conservation Plan (DRECP) "Habitat Intactness" and "Species Distribution" models for this species indicate that there is a moderately low to very low level of habitat intactness in the Project vicinity. Due to the reasons discussed in these findings, Mohave ground squirrel are not likely to occur within the Project Area and the Project is not likely to adversely affect this species.

Crotch's Bumble Bee – California Candidate Endangered

The Crotch's Bumble Bee (CBB) occurs in open grassland, scrub, shrubland, desert scrub, and other

habitats supporting abundant native flowering plants. The species typically occupies relatively hot, dry environments and requires a diverse succession of blooming forbs throughout its active season. Nest sites occur underground in rodent burrows and other cavities, or above ground in grass tussocks, rock piles, and similar protected locations. Important forage plants include milkweeds (*Asclepias spp.),* phacelias (*Phacelia spp.*), sages (*Salvia spp.*), lupines (*Lupinus spp.*), poppies (*Eschscholzia spp.*), and wild buckwheats (*Eriogonum spp.*). Queens are generally active from late winter through spring, while workers and males are present from spring through late summer or fall. Surveys are most effective during the flowering season when forage resources are available.

> Findings: CBB habitat generally includes abundant flowering plants. The Project area is predominantly unvegetated and does not support sufficient flower resources to support this species. Further it is subject to stochastic flooding and eroding events. Therefore, the Project area is not suitable for this species.

Monarch Butterfly – Threatened

The Monarch butterfly (MB) occurs Monarch Butterfly (*Danaus plexippus*) requires milkweed (*Asclepias spp.*) for reproduction and utilizes a variety of flowering plants as nectar resources during breeding and migration. Suitable habitat consists of areas supporting milkweed and diverse native flowering plants, including grasslands, scrublands, desert washes, roadsides, and disturbed open habitats. Western monarchs overwinter in coastal California tree groves with suitable microclimatic conditions. The species has potential to occur in the Victorville region where milkweed and adequate nectar resources are present. The key habitat feature to evaluate is the presence of native milkweed species such as desert milkweed (*Asclepias erosa*) and woollypod milkweed (*Asclepias eriocarpa*), along with seasonally available nectar plants.

> Findings: MB habitat includes abundant the presence of milkweed sp. and other flowering plants. The Project area is predominantly unvegetated and does not support sufficient flower resources to support this species. Further it is subject to stochastic flooding and eroding events. Therefore, the Project area is not suitable for this species.

Burrowing owl – State Candidate Engendered/Federal SSC

The burrowing owl (BUOW) is a ground dwelling owl typically found in arid prairies, fields, and open areas where vegetation is sparse and low to the ground. The BUOW is heavily dependent upon the presence of mammal burrows, with ground squirrel burrows being a common choice, in its habitat to provide shelter from predators, inclement weather and to provide a nesting place. They are also known to make use of human- created structures, such as cement culverts and pipes, for burrows. BUOW spend a great deal of time standing on dirt mounds at the entrance to a burrow or perched on a fence post or other low to the ground perch from which they hunt for prey. They feed primarily on insects such as grasshoppers, June beetles and moths, but will also take small rodents, birds, and reptiles. They are active during the day and night but are considered a crepuscular owl; generally observed in the early morning hours or at twilight. The breeding season for BUOW is February 1 through August 31.

BUOW have disappeared from significant portions of their range in the last 15 years and, overall, nearly 60 percent of the breeding groups of owls known to have existed in California during the 1980s had disappeared by the early 1990s. The BUOW is not listed under the federal ESA but is considered both a

State and federal SSC. The BUOW is a migratory bird protected by the international treaty under the Migratory Bird Treaty Act of 1918 and by State law under the California FGC (FGC #3513 & #3503.5).

Findings: Per the definition provided in the 2012 California Department of Fish and Game Staff Report on Burrowing Owl Mitigation, "Burrowing owl habitat generally includes, but is not limited to, short or sparse vegetation (at least at some time of year), presence of burrows, burrow surrogates or presence of fossorial mammal dens, well- drained soils, and abundant and available prey." The nearest documented BUOW occurrence (2002) is approximately 1 mile west of the Project site.

The habitat assessment survey was structured, in part, to detect BUOW. The survey consisted of walking transects spaced approximately 30 feet apart to provide 100 percent visual coverage of the Project site, wherever potentially suitable desert tortoise habitat was present, including an approximately 500-foot buffer area around the Project site. The result of the survey was that no evidence of BUOW was found in the survey area. No BUOW individuals or sign including castings, feathers or whitewash were observed. Therefore, BUOW are considered absent from the Project Area at the time of survey and the Project is not likely to adversely affect this species.

Special-Status Habitats

The Project site is not within any sensitive habitats, including any USFWS designated Critical Habitat for any federally listed species. However, the Project site is adjacent to the Mojave River Unit of USFWS designated SWFL Critical Habitat to the east of the Project site. No portion of the Project Area is within or adjacent this Critical Habitat unit, or any other sensitive habitats.

Jurisdictional Waters

The proposed Project will not impact any federally jurisdictional waters subject to regulation by the United States Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA) or the RWQCB under Section 401 of the CWA, respectively. However, the Project will impact ephemeral stream subject to regulation by the RWQCB under Porter-Cologne and the CDFW under Section 1602 of the California Fish and Game Code (FGC), respectively.

Nesting Birds

There is habitat within the Project Area that is suitable to support nesting birds, including adjacent habitat potentially suitable to support Southwestern Willow Flycatcher (SWFL) and Least Bells Vireo (LBVI). Most native bird species are protected from unlawful take by the Migratory Bird Treaty Act (MBTA). Additionally, the State of California provides protection for native bird species and their nests in the FGC under Sections 3503, 3503.5, 3511, 3513, and 3800, respectively (**Appendix 3**). Bird nesting protections in the FGC include the following (Sections 3503, 3503.5, 3511, 3513 and 3800): Section 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird.

- Section 3503.5 prohibits the take, possession, or needless destruction of any nests, eggs, or birds in the orders Falconiformes (new world vultures, hawks, eagles, ospreys, and falcons, among others), and Strigiformes (owls).
- Section 3511 prohibits the take or possession of Fully Protected birds.
- Section 3513 prohibits the take or possession of any migratory nongame bird or part thereof, as designated in the MBTA. To avoid violation of the take provisions, it is generally required that Project-related disturbance at active nesting territories be reduced or eliminated during the nesting cycle.

- Section 3800 prohibits the take of any non-game bird (i.e., bird that is naturally occurring in California that is not a gamebird, migratory game bird, or fully protected bird).

The Project could result in direct impacts to nesting birds potentially occurring within the Project site. In general, impacts to all bird species (common and special status) can be avoided by conducting work outside of the nesting season, which is generally February 1st through August 31st. However, if all work cannot be conducted outside of nesting season, mitigation would be necessary.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The construction and operation of the Project may result in direct and indirect impacts on special-status wildlife species. The extent and nature of impacts on special-status wildlife species varies depending on the species under consideration, their range, and the type and quality of suitable habitats present.

Temporary and permanent indirect impacts on special-status wildlife species would occur through construction activities associated with the proposed Project, with no operational impacts anticipated, as once the proposed improvements are installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Potential indirect impacts include erosion, soil compaction, increased siltation and sedimentation, fractures in the hardpan soils, alteration of jurisdictional water hydrology, dust aerosolization, host plant stress, destruction of native vegetation, habitat fragmentation, and noise and light pollution. These indirect impacts could lead to the disturbance of special-status wildlife species such as a temporary shift in foraging patterns or territories, refugia abandonment, increased predation, decreased reproductive success, and reduced population viability.

As described throughout the introductory sections presented before this impact analysis, a Biological Resources Assessment (BRA) survey was conducted by HDR to identify potential habitat for special status plants and wildlife within the Project Area. No State and/or federally listed threatened or endangered species or other special status species were observed within the Project Area during survey and none are expected to occur. Although the project is adjacent to the Mojave River floodplain, the surrounding areas have been maintained by flood control and is largely unvegetated. However, the Project site is marginally suitable for several special status species, including desert tortoise and BUOW.

Worker Environmental Awareness Program

MM BIO-1 would ensure that direct impacts to the special status species are mitigated through implementation of a Worker Environmental Awareness Program (WEAP) that will ensure avoidance of impacts to special status species.

BIO-1 ***A qualified biologist shall develop a Worker Environmental Awareness Program (WEAP) that shall include information on general and special status species, including but not limited to burrowing owl (Athene cunicularia) and desert tortoise (Gohperus agassizii) within the project area, identification of these species and their habitats, current conservation_status, techniques and mitigation measures that shall be being implemented during construction to avoid impacts to species, consequences of killing***

or injuring an individual of a listed species, and reporting procedures when encountering listed or sensitive species.

Construction crews, foremen, and other personnel potentially working on site will attend this education program and place their name on a sign-in sheet. This briefing shall include provisions of any requirements required for the project. The contractor shall implement WEAP training on the first day of work and periodically throughout construction as needed.

Mojave Ground Squirrel

Based on the habitat conditions and existing disturbances within the Project site and surrounding area, as well as the proximity of the Project Area relative to the current known population distributions of Mohave ground squirrel, this species is not likely to occur within the Project Area and the Project is not likely to adversely affect this species. No additional avoidance, minimization or mitigation measures beyond those to those already recommended for Mojave desert tortoise (below) are warranted or recommended.

Burrowing Owl

A BUOW habitat suitability assessment was conducted by HDR biologists in April 2026 that included 100 percent visual coverage of the Project site, wherever potentially suitable desert tortoise habitat was present, including an approximately 500-foot buffer area around the Project site. The result of the survey was that no evidence of BUOW was found in the survey area. No BUOW individuals or sign including castings, feathers or whitewash were observed and BUOW are considered absent from the Project Area at the time of survey. Although the Project is not likely to adversely affect this species, there is still a low potential for this species to occur in the Project Area and precautionary avoidance measures are recommended to ensure the Project does not result in any impacts to BUOW.

BUOW is included as one of the species covered in the WEAP that all construction crews, foremen, and other Project personnel potentially working on site should attend prior to the first day of work (**MM BIO-1**).

As previously discussed, BUOW is a state candidate for listing as an endangered species under CESA. As such, BUOW currently receive the same legal protection afforded to a state listed threatened or endangered species (FGC sections 2074.2 and 2085). If BUOW are determined to be present within the project area prior to project implementation, then any potential project related impacts to BUOW would need to be avoided and coordination with the CDFW may be required. **MM BIO-2** would ensure protection of this species in light of project implementation.

BIO-2 ***Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys shall be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied***

burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW prior to commencing Project activities.

Mojave Desert Tortoise

Although the disturbed four-wing saltbush scrub and creosote bush scrub habitat within the western half of the Project Area is marginally suitable for the federally listed as endangered Mojave desert tortoise, a protocol-level desert tortoise survey was conducted within the Project Area by HDR biologists in April 2026 and the result of the survey was negative for this species. No desert tortoise individuals or sign including desert tortoise burrows, scat, carcasses or other sign were observed during survey and Mojave desert tortoise are considered absent from the Project Area at the time of survey. Although the Project is not likely to adversely affect this species, there is still a low potential for this species to occur in the Project Area, and precautionary avoidance measures are recommended to ensure the Project does not result in any impacts to Mojave desert tortoise.

A qualified biologist shall develop a WEAP that would include information on general and special status species within the Project Area, identification of these species and their habitats, techniques being implemented during construction to avoid impacts to species, consequences of killing or injuring an individual of a listed species, and reporting procedures when encountering listed or sensitive species. All construction crews, foremen, and other Project personnel potentially working on site should attend this education program prior to the first day of work. This shall be enforced through the implementation of **MM BIO-1.**

The Project shall also conduct preconstruction surveys for desert tortoise days prior to new ground disturbance within each phase of development to verify that Mojave desert tortoise remain absent from the Project Area. This shall be enforced through **MM BIO-3,** below.

BIO-3 ***Preconstruction surveys for Desert Tortoise shall be conducted no more than 48 hours prior to initiation of Project activities and after any pause in Project activities lasting 30 days or more. Desert tortoise pre-construction surveys shall be conducted in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology; if the biologist detects a desert tortoise, the biologist or applicant will contact the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife immediately. If the survey confirms presence of desert tortoise, the biologist will make a determination regarding tortoise mitigation: (1) if desert tortoise fencing needs to be installed around the perimeter of the construction work zone; or (2) if no further action is required. The biologist/monitor should remain on-call during construction activities to respond to a circumstance where a desert tortoise wanders into the construction area. If complete avoidance cannot be achieved, VVWRA shall obtain an Incidental Take Permit (ITP) first from the USFWS and also a CESA ITP from the CDFW under Fish and Game Code section 2081.***

A qualified biological monitor should be present during all ground disturbing activities (clearing, grubbing and grading) to ensure that construction related activities do not impact any sensitive wildlife that may wander onto the site during construction. This shall be enforced through **MM BIO-4,** below.

BIO-4 ***A qualified biological monitor shall be present during all project activities to ensure no burrowing owl (Athene cunicularia), desert tortoise (Gopherus agassizii), or other sensitive species wander onto the site and to ensure no impacts will result to sensitive species during Project installation.***

No other sensitive species have been identified as having a potential to exist within or be impacted by the proposed project. Therefore, with the implementation of **MMs BIO-1 through BIO-4,** the proposed project would have a less than significant potential to result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

b. *Less Than Significant Impact* – Implementation of the proposed project has minimal potential to have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. As stated in the BRA provided as **Appendix 3** prepared by HDR, the project area does not contain any sensitive habitats, including any USFWS designated Critical Habitat for any federally listed species, and the project will not result in any loss or adverse modification of Critical Habitat. The Project site is not within any sensitive habitats, including any USFWS designated Critical Habitat for any federally listed species. However, the Project site is adjacent to the Mojave River Unit of USFWS designated SWFL Critical Habitat to the east of the Project site. No portion of the Project Area is within or adjacent this Critical Habitat unit, or any other sensitive habitats. Thus, no significant impacts to riparian habitat or other sensitive communities are anticipated to occur as a result of implementation of the proposed project.

c. *Less Than Significant With Mitigation Incorporated* – According to the data gathered by HDR in **Appendix 3**, no federally protected wetlands occur within the project footprint. However, the result of the jurisdictional waters assessment is that there are no wetland or non-wetland waters of the United States (WOTUS) or waters of the State potentially subject to regulation by the USACE under Section 404 of the CWA. However, Ossum Wash is an ephemeral stream that is also subject to the FGC and the Porter Cologne Water Quality Control Act under the jurisdictions of the CDFW and RWQCB, respectively. Therefore, any proposed permanent or temporary impacts to this feature would require a "Lake or Streambed Alteration Agreement" from the CDFW, as well as a permit from the RWQCB for "Discharges of Dredged or Fill Material to Waters of the State".

FGC Section 1602 Lake or Streambed Alteration Agreement

An FGC Section 1602 Lake or Streambed Alteration (LSA) Agreement is required for all activities that alter streams (including ephemeral streams) and lakes and their associated riparian habitat. In addition to the formal application materials and fee (based on cost of the Project), a copy of the appropriate CEQA documentation must be included with the application.

Regional Water Quality Control Board Permitting

The Project Area is within the jurisdiction of the Lahontan RWQCB. The RWQCB regulates impacts to Waters of the State of California under the Porter Cologne Water Quality Control Act through issuance of a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements, depending upon the level of impact and the waterway. Project-related impacts would require a RWQCB permit and the Project Proponent would be required to submit an

application for Discharges of Dredged or Fill Material to Waters of the State to the Lahontan RWQCB prior to commencement of any Project-related activities that may impact Ossum Wash, or any other Waters of the State. In addition to the formal application materials and fee (based on area of impact), a copy of the appropriate California Environmental Quality Act (CEQA) documentation must be included with the application. Thus, the following mitigation measure is required:

BIO-5 ***California Department of Fish and Wildlife (CDFW) shall be notified pursuant to Fish and Game Code section 1602. If CDFW determines that the Project may substantially affect fish and wildlife resources, then CDFW shall issue a Streambed Alternation Agreement (Agreement). The Agreement shall include measures to avoid, minimize, and mitigate impacts to Fish and Game Code section 1602 resources.***

Through an Agreement from CDFW and/or other agencies (USACE, RWQCB [regulatory agencies]) with jurisdiction over impacts to jurisdictional waters, VVWRA shall minimize discharge of fill to the extent feasible, and any discharge of fill not avoidable and all impacts to Fish and Game Code section 1602 resources shall be authorized and mitigated through compensatory mitigation in an Agreement. Mitigation shall be provided by restoration of temporary impacts, enhancement of existing resources, or for permanent impacts as follows: purchasing into CDFW, Corps, or RWQCB authorized mitigation bank; or by selecting a site near the Project site and enhancing it with a native riparian habitat or invasive species removal in accordance with a habitat mitigation plan approved by regulatory agencies; or by acquiring sufficient compensating habitat to meet regulatory agency requirements. Impacts to jurisdictional waters shall be mitigated at a minimum 1:1 ratio, with the ultimate compensatory mitigation ratio being determined through negotiation with regulatory agency, and never at a rate of less than 1:1. The ratio will rise based on the type of habitat, habitat quality, and presence of sensitive or listed plants or animals in the affected area. This ratio will be determined by the regulatory agency, and must be deemed sufficient by the regulatory agency issuing the permit to compensate for/offset the impacts to the jurisdictional waters and supported species and habitats therein. A Habitat Mitigation and Monitoring Proposal shall be prepared by a biologist or regulatory specialist and reviewed and approved by the appropriate regulatory agencies. These agencies (USACE, RWQCB, CDFW and any other applicable regulatory agency with jurisdiction over the proposed Project) can impose greater mitigation requirements in their permits, but VVWRA will utilize the ratios outlined above as the minimum required to offset or compensate for impacts to jurisdictional waters, riparian areas or other wetlands.

Thus, with implementation of the above mitigation measure, there is a less than significant potential for implementation of this project to impact any federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

d. *Less Than Significant With Mitigation Incorporated* – Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two

comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both anthropogenic disturbance and natural fluctuations in resources.

According to the San Bernardino Countywide Plan, the project site has not been identified as occurring within a Wildlife Corridor or Linkage. As designated by the San Bernardino Countywide Plan,[4] the major open space areas documented in the vicinity of the project site is approximately 6.32 miles northeast of the site (Northen Lucerne Wildlife Linkage). The site is separated from this identified regional wildlife corridors and linkages by existing development and roadways, and undeveloped land. While the Ossum Wash itself is a creek leading to the Mojave River, there are no riparian corridors or creeks connecting the project site to identified open space or Wildlife Linkage Areas.

Further, the proposed Project would not prohibit the continued function of Ossum Wash, as once the proposed improvements are installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. However, the proposed project could result in construction impacts from the installation of the proposed Ossum Wash Repair Project. Construction may cause adverse impacts on migratory species through disturbing or harming nesting birds, which are protected under the MTBA, but these impacts would be subject to the provisions of regulatory permitting (CWA Section 401 and 404 permitting, and FGC Section 1602, Lake and Streambed Alteration Agreement permitting), which would ensure that wildlife linkages and corridors are maintained and impacts thereof are minimized for the temporary duration of construction. **MM BIO-5** would ensure that the Project that would discharge of fill or streambed alteration of state or federal water jurisdictional areas are designed to minimize and be protective of the environment both during construction, and once operational for activities that would require ongoing maintenance within jurisdictional features. The impacts to jurisdictional features would thereby be subject to the provisions of regulatory permitting (CWA Section 401 and 404 permitting, and FGC Section 1602 LSA Agreement permitting), which would ensure that wildlife linkages and corridors are maintained for the temporary duration of construction. Thus, with implementation of mitigation, impacts would be less than significant.

The State does protect all migratory and nesting native birds. Further, the project APE and surrounding area consists of habitat that is suitable to support nesting birds. Thus, the project area may include areas that function as nesting locations for native birds. To avoid impacting nesting birds as required by the MBTA and California FGC, the following mitigation measure shall be implemented:

BIO-6 ***Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the project areas (including access routes) and a 500-foot buffer surrounding the project areas, no more than three (3) days prior to the initiation of project***

[4] San Bernardino County, 2026. NR-2 Parks and Open Space Resources. https://experience.arcgis.com/experience/cd943ee7097546b08b0349546158d99d#data_s=id%3AdataSource_4-acec_desig_poly_190219_9628%3A4 (Accessed 08/10/26)

activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Thus, with implementation of the above measures, any effects on wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

e. *Less Than Significant Impact* – Development of the proposed Project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources. Impacts to biological resources have been addressed above under issues IV(a-d). Due to the nature of the proposed project—installing repairs to a Wash creekbed—no trees or other biological resources that might be protected exist within the project footprint. Therefore, the potential for the project to conflict with local policies or ordinances pertaining to biological resources would be considered less than significant.

f. *No Impact* – Please refer to the discussion under response IV(a) above. The project has not been identified as being located within an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the project would therefore not result in a significant impact to any such plans. No further mitigation is necessary.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

SUBSTANTIATION: The following information is provided based on the *Identification and Evaluation of Historic Properties: Ossum Wash Interceptor Project, City of Victorville, San Bernardino County, California* prepared by CRM TECH, dated July 29, 2026. This report is provided as **Appendix 4** to this Initial Study.

Background and Summary

Between April and July 2026, CRM TECH performed a cultural resources study on the Area of Potential Effects (APE) for the Ossum Wash Repair Project. This study is a part of the environmental review process for the undertaking, as required by the lead agency, namely the Victor Valley Wastewater Reclamation Authority (VVWRA), pursuant to the California Environmental Quality Act (CEQA). Because the undertaking may require federal oversight, the study was conducted in accordance with the provisions of both CEQA and Section 106 of the National Historic Preservation Act (NHPA), in a process known as CEQA-Plus. The purpose of the study is to provide the VVWRA and other responsible public agencies with the necessary information and analysis to determine whether the undertaking would have an adverse effect on any "historic properties," as defined by 36 CFR 800.16(l), or "historical resources," as defined by California PRC §5020.1(j), that may exist in the APE.

In order to accomplish this objective, CRM TECH conducted a cultural resources records search, initiated a Native American Sacred Lands File search, contacted local Native American representatives, pursued historical and geoarchaeological background research, completed an intensive-level field survey, and carried out an Extended Phase I (XPI) subsurface archaeological exploration program on the property. Throughout the course of these research procedures, no "historic properties" or "historical resources" were encountered in the APE. The only cultural resource found during the study was an isolated mano recovered approximately 180 centimeters below surface. It was recorded into the California Historical Resources Inventory under the temporary designation of Isolate 4390-1, pending assignment of a permanent identification number. Occurring out of an intact depositional context, however, the isolate does not constitute a potential "historic property"/"historical resource" and requires no further consideration under Section 106 or CEQA provisions.

Since no "historic properties" or "historical resources" are known to be present within or adjacent to the APE, and since the background search and the XPI excavations did not find the subsurface sediments in

the vertical APE to be sensitive for potentially significant archaeological remains, CRM TECH recommends to the VVWRA and other responsible public agencies a finding of *No Adverse Effect* on "historic properties" under Section 106 and *No Impact* on "historical resources" under CEQA. However, the APE is known to be situated in relatively close proximity to the Topibabit Archaeological District (Site 36-029491), which encompasses the location of the documented Serrano village of Topipabit. As such, it is possible, even likely, for additional Native American artifacts to be unearthed during future ground disturbances in the APE. Therefore, archaeological and Native American monitoring is recommended during all earth-moving operations associated with the proposed undertaking. Further, the result of the AB 52 consultation was such that the YSMN has requested the following: implementation of several mitigation measures, including archaeological and tribal cultural monitoring, to ensure that no significant impacts to tribal cultural resources occur as a result of project implementation.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Per the above discussion and definition, no archaeological sites or isolates were recorded within the Project boundaries; thus, none of them requires further consideration during this study. As stated above, throughout the course of these research procedures, no "historic properties" or "historical resources" were encountered in the APE. The only cultural resource found during the study was an isolated mano recovered approximately 180 centimeters below surface. It was recorded into the California Historical Resources Inventory under the temporary designation of Isolate 4390-1, pending assignment of a permanent identification number. Occurring out of an intact depositional context, however, the isolate does not constitute a potential "historic property"/"historical resource" and requires no further consideration under Section 106 or CEQA provisions. In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the Project:

- No historical resources within or adjacent to the Project area have any potential to be disturbed as they are not within the proposed area in which the Project would be constructed and developed, and thus, the Project as it is currently proposed would not cause a substantial adverse change to any known historical resources.
- No further cultural resources investigation is necessary for the proposed Project unless construction plans undergo such changes as to include areas not covered by this study.

However, if any ground disturbing activities are required, the following mitigation measure would ensure that impacts to any buried cultural materials that may be discovered during earth moving activities is carried are less than significant:

CUL-1 ***Should any cultural resources be encountered during construction, any earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist.***

Responsibility for making this determination shall be with VVWRA's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures to be implemented within the guidelines of the California Environmental Quality Act to reduce impacts to discovered resources to a less than significant level.

As previously stated, the result of the AB 52 consultation was such that the YSMN has requested the following: implementation of several mitigation measures, including archaeological and tribal cultural monitoring, to ensure that no significant impacts to tribal cultural resources occur as a result of project implementation. Thus, the following mitigation measures shall be implemented to further minimize impacts to archaeological and tribal resources:

CUL-2 Monitoring and Treatment Plan
A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CUL-3 Archaeological Monitoring
Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

CUL-4 Worker Environmental Awareness Program
Prior to project initiation, a qualified archaeologist should be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training should be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Tribal representatives from the Consulting Tribes, such as Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians) will be allowed to attend and/or participate in the WEAP training should they elect to and will be given ten days' notice prior to the training. Archaeological sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues,

regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

With the implementation of the above mitigation, as well as the mitigation identified under Tribal Cultural Resources, the potential for impacts to cultural resources would be reduced to a less than significant level. No additional mitigation is required.

c. *Less Than Significant Impact* – No available information suggests that human remains may occur within the Area of Potential Effect (APE) and the potential for such an occurrence is considered very low. If any human remains are discovered during Project grading, they will need to be treated in accordance with the provisions of the Health and Safety Code (HSC) §7050.5 and PRC §5097.98, which is mandatory. State law (Section 7050.5 of the Health and Safety Code) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered regulatory compliance and not unique mitigation under CEQA. Thus, the potential for impact to discovery and treatment of human remains will be reduced to a less than significant level. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the Project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operations?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The proposed Project consists improvements to the Ossum Wash that would protect two underground sewer lines that cross the channel. Improvements include rip-rap (i.e., rocks) to protect the adjacent banks and channel bottom so the pipelines would not be uncovered during scouring storm events. The planned improvements will require no energy (i.e., electricity or natural gas) once installed and no new lighting is planned. Construction activities will involve limited use of bulldozers and trucks to transport rip-rap, and trucks to apply grout in limited locations. Onsite soils will be moved as needed to accommodate the rip-rap and excavation will generate approximately 2,500 CY) of cut material and 250 cubic yards of fill, with surplus material transported off-site (2,250 CY of export). In addition, essentially all of the rip-rap brought to the site will be used for the planned protection improvements. Any small amount of waste generated during construction (e.g., excess grout) will be removed from the site by construction vehicles. No improved or inhabited structures will be constructed or installed as part of this Project.

During construction, the proposed Project will utilize construction equipment that is California Air Resources Board CARB approved, minimizing emissions generated and electricity required to the extent feasible. Equipment not in use for 5 minutes must be turned off, and electrical construction equipment must be used where available. This standard requirement would prevent a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARB regulations regarding energy efficiency. Under the construction scenario outlined above, the proposed Project will not result in wasteful, inefficient, or unnecessary energy consumption during construction.

b. The proposed Project will not require ongoing electricity or natural gas consumption so no energy suppliers or service facilities will be impacted by Project construction or operation. The Project would comply with AQMD Rules 431.1 and 431.2 to reduce the release of undesirable emissions. Diesel exhaust emissions from diesel vehicles and off-road diesel vehicle/equipment operations will also comply with applicable state and federal emission regulations. Compliance with these regulatory requirements for construction energy use would not be wasteful or unnecessary use of energy. Therefore, the proposed Project will not result in wasteful, inefficient, or unnecessary energy

consumption that could result in a significant adverse impact to energy issues based on compliance with the referenced laws, regulations and guidelines. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND SOILS: Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
(iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite 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?	☐	☐	☒	☐

SUBSTANTIATION

Impact Analysis

a. i. Ground Rupture

No Impact – According to the regulatory map obtained from the California Department of Conservation Earthquake Zones of Required Investigation Map showing Alquist-Priolo Earthquake

Fault Zones and other seismic hazards (**Figure VII-1**), the proposed Project site is not located in an area that has been mapped as containing geologic hazards, and therefore is not located in an Alquist Priolo Earthquake Fault Zone. The nearest fault zones are about 9.5 miles to the north (the Helendale Fault Zone) and approximately 24 miles to the south at the San Bernardino Mountains (the San Andreas Fault Zone). As such, the Project site and general area do not contain any known faults, active or inactive. Therefore, no potential exists for the proposed Project to experience any fault rupture along a delineated active fault.

ii. Strong Seismic Ground Shaking

Less Than Significant Impact – The proposed Project site, as with most of southern California, is in a seismically active area, and will most likely be subject to some groundshaking during the life of the planned Ossum Wash improvements. According to the **Figure VII-1**, the proposed Project is not located in close proximity to any delineated active faults. However, due to the proximity of the active San Andreas Fault, about 24 miles to the south, and the active Helendale Fault, about 9.5 miles to the northeast, the Project site and area can be exposed to significant ground shaking during major earthquakes on either of these regional faults. The nature of the planned improvements (placement of rip-rap on wash slopes and channel bottom) is such that it not typically susceptible to severe damage from seismic ground shaking. At most it would redistribute some of the rocks but no substantial damage would be expected even during strong seismic events. Construction workers would generally only be at risk when working indoors. This is because seismic ground shaking may cause structural damage that could affect persons inside structures to be exposed to risk associated with strong seismic ground shaking when indoors or atop a roof of a structure. Overall, construction would be temporary in nature and the potential for adverse effects on humans as a result of seismic ground shaking during construction is less than significant. Thus, construction impacts would be less than significant. No new structures or occupied facilities are planned as part of the proposed Project, so there would be no adverse effects on humans as a result of seismic ground shaking during operation. Therefore, any impacts associated with strong ground shaking will be less than significant without mitigation.

iii. Seismic-related Ground Failure Including Liquefaction

No Impact – The proposed Project site is located within a limited portion of the Ossum Wash. According to the **Figure VII-1**, the site does not contain land with any liquefaction susceptibility. Further, construction of the proposed Project would be temporary, with the majority of the proposed facilities proposed to be developed underground and outdoors. Construction workers would generally only be at risk when working indoors. This is because liquefaction may cause structural damage that would could affect persons inside structures to be exposed to risk associated with liquefaction when indoors, which is not anticipated to occur during construction. Overall, construction would be temporary in nature and the probability of liquefaction during construction is low. Thus, no construction-related liquefaction impacts are anticipated. No new structures or occupied facilities are planned as part of the proposed Project, so there would be no adverse effects on humans as a result of liquefaction during Project operation. No impacts are anticipated and no mitigation is required.

iv. Landslides

No Impact – The Project area is relatively flat, though Ossum Wash does contain two banks that will be improved with rip-rap to protect the underground sewer lines from scouring. The channel bottom and surrounding desert land are all flat and the wash slopes do not constitute major slopes that could be subject to landslide activity. This area as not been delineated on **Figure VII-1** as being located in an area that is susceptible to landslides. As such, no potential events can be identified that would result in adverse effects from landslides or that would cause landslides that could expose people or structures to such an event as a result of Project implementation during either construction or operation. No impacts are anticipated and no mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – The purpose of this Project is to protect existing underground sewer lines form erosion caused by scouring runoff within the Ossum Wash during storm events. During construction, the Project site has a limited potential for soil erosion, mainly as soil is moved or disturbed for placement of the rip-rap. Project activities will not involve substantial ground disturbance that would expose the underlying soil to erosive forces, such as wind and water that are greater than that which occurs at present due to the site consisting of the active Ossum Wash. Use of standard best available control measures (BACMs) to control fugitive dust will fully mitigate potential wind erosion impacts. Mojave Desert Air Quality Management District (MDAQMD) Rule 403 would ensure that construction activities that generate wind-induced soil erosion are below significance thresholds as this requirement is intended to prevent significant wind-induced soil erosion. As a mandatory requirement, mitigation is not required to ensure compliance with the above Rule.

Larger Projects (one-acre or more) must implement Stormwater Pollution Prevention Plans (SWPPPs) that are mandated by the State and County to control runoff during construction and Water Quality Management Plans (WQMPs) to control runoff and erosion. For smaller Projects of less than one acre, such as that which is proposed as part of this Project. These requirements to not apply Without the implementation of best management practices (BMPs), a significant erosion impact could occur. Thus, mitigation is necessary to minimize erosion impacts as a SWPPP and WQMP would not be required. The implementation of **MM GEO-1** is necessary to prevent a significant construction related erosion impact, as it would ensure that the proposed Ossum Wash improvements, which would disturb less than one acre in size, would not exacerbate conditions related to erosion associated with runoff from construction sites through the implementation of BMPs. Thus, through the implementation of mitigation, impacts related to implementation of the proposed Project would be less than significant.

GEO-1 ***For each site-specific Project that is less than one acre in size requiring ground disturbing activities such as grading, VVWRA shall identify and implement BMPs to minimize soil erosion and loss of topsoil comparable to that which would be required under a SWPPP (BMPs may include, but are not limited to hay bales, wattles, detention basins, silt fences, coir rolls, etc.) to ensure that the discharge of the storm runoff from the construction site does not cause erosion downstream of the discharge point. If any substantial erosion or sedimentation occurs as a result of discharging storm water from a Project construction site, any erosion or sedimentation damage shall be restored to pre-discharge conditions.***

The implementation of **MM GEO-1** would ensure that implementation of the proposed Project would not exacerbate conditions related to erosion associated with runoff from construction through the implementation of BMPs.

Potential water erosion impacts to soil include accelerated erosion and down slope deposition and increased potential for surficial sliding and slumping. Once rip-rap materials are in place, the potential for erosion will be minimized or eliminated. Thus, no new potential for erosion would occur and operational impacts would be less than significant. No further mitigation is necessary.

c. *Less Than Significant Impact* – Refer to the discussion under VII(a) above. Potential instability associated with slope stability and liquefaction related to the Project was determined to be negligible. The potential for shrinkage or subsidence at the site was determined to be limited as the Project is not identified by the California Department of Conservation (**Figure VII-2**) or San Bernardino Countywide Plan as being located within a liquefaction hazard zone, nor do these sources identify any landslide potential at or around the Project site. Further, the lack of these hazards delineated on any maps in the Project area is indicative that there is negligible possibility that soil instability from liquefaction, subsidence, lateral spreading, and settlement may occur within the Project area. The nature of the planned improvements (placement of rip-rap on wash slopes and channel bottom) is such that it not typically susceptible to severe damage from soil instability. At most it would redistribute some of the rocks but no substantial damage would be expected. Therefore, the potential for the Project to be located on a geologic unit or soil that is unstable or for the Project to cause the soils to become unstable is considered less than significant. No mitigation is required.

d. *No Impact* – According to the United States Department of Agriculture (USDA) Web Soil Survey Soil map, the whole of the proposed Project site is located on Villa Loamy Sand (refer to **Appendix 5**). Expansive soils are generally of a clay type soil, not a sandy soil such as the Villa Loamy Sand series soils that underlay the Project site. Furthermore, the Project does not require the construction of any inhabited structures that could be adversely impacted by expansive soils. Thus, based on the absence of clay-type soils on site, the proposed Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2025), creating substantial risks to life or property. No impacts are anticipated and no mitigation is required.

e. *No Impact* – The Project does not propose any septic tanks or alternative wastewater disposal systems. Therefore, determining if the Project site soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply. No impacts are anticipated. No mitigation is required.

f. *Less Than Significant Impact* – The Project site is located within an active desert wash/flood channel and has been repeatedly disturbed by flood events. In addition, the entire valley floor consists of alluvial materials transported by storms and precipitation over thousands of years. According to the California Department of Conservation Geologic Map of California[5] (**Figure VII-3**), the deposits along Ossum Wash at this location are Younger Alluvium (Q). Installation of the proposed flood

[5] California Department of Conservation, 2026. Geologic Map of California. https://maps-cadoc.opendata.arcgis.com/maps/cadoc::geologic-map-of-california/explore?location=34.443117%2C-117.402549%2C14 (Accessed 08/03/26)

protection (i.e., rip-rap) will not involve deep excavations either on the wash bottom or the adjacent banks. In fact, much of the rip-rep will be placed on native soils without excavation. While the Victor Valley has yielded fossiliferous materials in the past, it is not likely this Project will disturb underlying geologic strata that could contain fossils. Therefore, the potential for this Project to impact paleontological resources is considered less than significant. No mitigation is required.

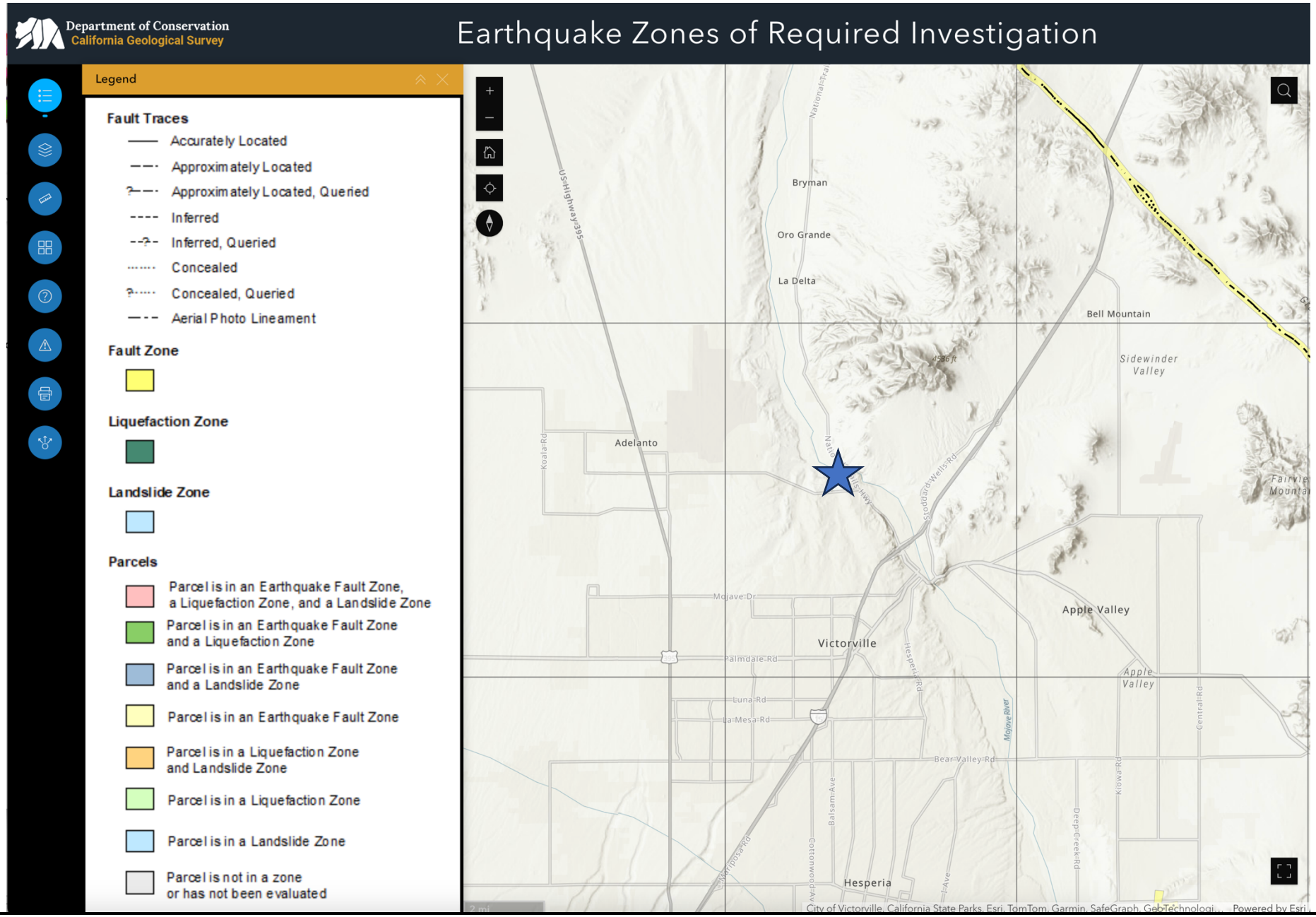


FIGURE VII-1

Tom Dodson & Associates
Environmental Consultant

Fault Zones Map

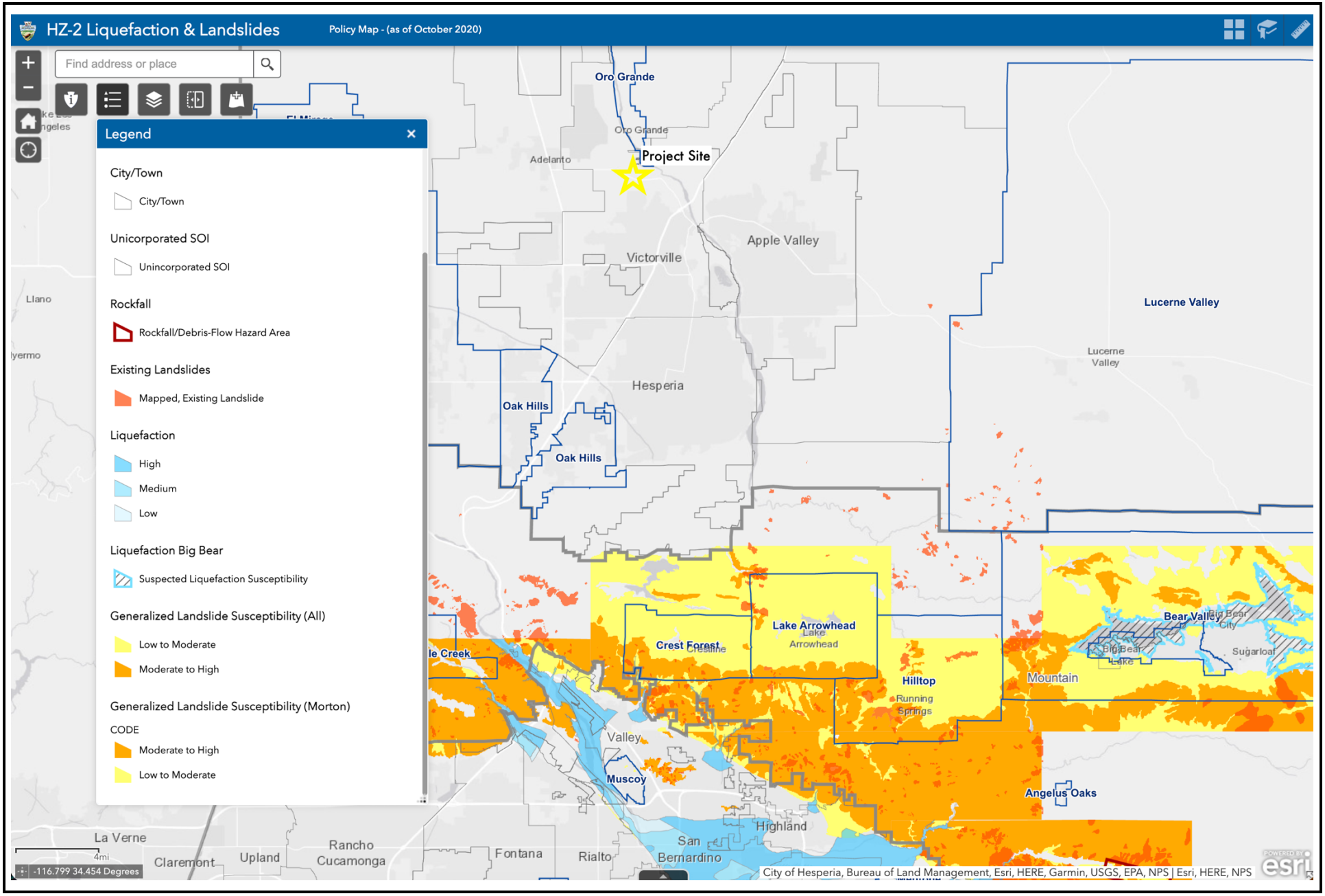


FIGURE VII-2

Tom Dodson & Associates
Environmental Consultant

Liquefaction and Landslide Potential Map



FIGURE VII-3

Tom Dodson & Associates
Environmental Consultants

Soils Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Ossum Wash Repair Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated June 22, 2026. This AQGGA is provided as **Appendix 2** to this Initial Study.

Climate Change Setting

Global climate change (GCC) is the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual Project like the proposed Project evaluated in this memo cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, this memo would evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's

average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and there are no accepted emissions factors or methodology to accurately calculate these gases.

City of Victorville Climate Action Plan (CAP)

The City prepared a CAP in September 2015 to present GHG inventories, identify the effectiveness of California initiatives to reduce GHG emissions, and identify local measures selected by the City to reduce GHG emissions under the City's jurisdictional control to achieve the City's identified AB 32 2020 GHG reduction target. However, it should be noted that the City's CAP does not align with the statewide goals beyond 2020. Consequently, the City is currently working with the San Bernardino County Transportation Authority (SBCTA) to update the City's current CAP to address SB 32 and post-2020 GHG emission reductions.

Following the County's adoption of the Greenhouse Gas Reduction Plan Update on September 21, 2021, as part of SB 32, the City has implemented a screening table to align with the updated guidelines. In 2021, the County updated the GHG Review Process and Screening Tables. The San Bernardino County Regional Greenhouse Gas Reduction Plan highlights the 25 Partnership Cities, including Victorville, that partnered together to integrate the 100-point system currently used for GHG reduction initiatives.

The City has prepared a CAP, which provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. In order to determine consistency with the CAP, the City of Victorville provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP establishes categories of GHG reduction measures to reduce GHG emissions generated by development projects. CAP GHG reduction measure categories include: energy conservation, water use reduction, increased residential density or mixed uses, transportation management, and solid waste recycling. Within each category, individual sub-measures are assigned a point value under the city's GHG Measures Screening Table. The point values are adjusted according to the intensity of GHG reduction measure. "Modest" Measures that reduce GHG emissions by modest amounts are worth the least number of points; and enhanced GHG emissions reduction measures are worth the most points. Projects that yield at least 100 points are determined to be consistent with the CAP. As such, projects that achieve a total of 100 points or more do not require quantification of Project specific GHG emissions and, consistent with CEQA Guidelines, such projects are considered to have a less than significant individual and cumulative impact on GHG emissions.

Moreover, projects that are consistent with an adopted CAP may be found to cause a less than significant impact under CEQA. (CEQA Guidelines § 15064(h)(3)). Projects that are consistent with adopted CAPs are also considered to support and would not conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The Project is substantiated herein to be consistent with the CAP. Project GHG emissions impacts on the environment

are therefore considered less-than-significant. Additionally, because the Project is substantiated to be consistent with the CAP, the Project would not conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Additionally, it should be noted that an update to the Screening Table is underway. The City along with other local jurisdictions has coordinated with SBCTA on an updated Screening Table, which is currently pending approval by SBCTA.

Standards of Significance

According to the *CEQA Guidelines* Appendix G thresholds, to determine whether impacts from GHG emissions are significant. Would the Project:

- **Threshold 1**: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- **Threshold 2**: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The evaluation of an impact under CEQA requires measuring data from a Project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the *CEQA Guidelines* Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular Project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a Project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the Project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the Project emissions exceed a threshold of significance that the lead agency determines applies to the Project.
- **Consideration #3:** The extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the Project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a Project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the Project's incremental contribution to climate change and its conclusion that the Project's incremental contribution is not cumulatively considerable.

Establishment of Significance Thresholds

According to the MDAQMD's CEQA and Federal Conformity Guidelines, a Project is significant if it triggers or exceeds the most appropriate evaluation criteria. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO_2e per year (90,718.5 $MTCO_2e/yr$) is sufficient. A significant Project must incorporate mitigation sufficient to reduce its impact to a level that is not significant. A Project that cannot be mitigated to a level that is not significant must incorporate all feasible mitigation.

Impact Analysis

a. *Less Than Significant Impact* – Greenhouse gas emissions from the Project would primarily result from Project-related traffic, generating mobile source emissions, as well as from stationary source emissions. As mentioned, the Project mainly involves construction activities, and ongoing operations would generate mobile emissions from motor vehicles traveling to and from the site for periodic maintenance and inspections.

The estimated GHG emissions for Project are summarized in Table VIII-1. The estimated GHG emissions include emissions from Carbon Dioxide (CO_2), Methane (CH_4), Nitrous Oxide (N_2O), and Refrigerants (R). As shown in Table VIII-1, the Project would generate a total of approximately 1.56 MTCO2e/yr, which would not exceed the MDAQMD screening threshold of 90,718.5 MTCO2e/yr.

Table VIII-1: Total Project GHG Emissions

Source	Emissions (MT/yr)
	Total CO_2e
Annual construction emissions amortized over 30 years	1.56
Total CO_2e (All Sources)	1.56
Screening Threshold (CO_2e)	90,718.5
Threshold Exceeded?	NO

As previously shown in Table VIII-1, the Project will result in either approximately 1.56 $MTCO_2e/yr$, which would not exceed the screening threshold of 90,718.5 $MTCO_2e/yr$. This would be considered a less than significant impact. Detailed construction and operation model outputs are presented in Appendix 1 of the AQGGA. As the Project will not exceed the screening threshold of 90,718.5 $MTCO_2e/yr$, the proposed Project would result in a less than significant impact.

b. *Less Than Significant Impact* – Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions.

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85% below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean

technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Consistency with City of Victorville CAP

In order to determine consistency with the CAP, the City of Victorville provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP checklist measures are geared towards buildings and Projects that yield at least 100 points are determined to be consistent with the CAP. As such, projects that achieve a total of 100 points or more do not require quantification of Project specific GHG emissions and, consistent with CEQA Guidelines, such projects are considered to have a less than significant individual and cumulative impact on GHG emissions. As mentioned previously, the CAP checklist measures are geared towards buildings, the Project proposes a truck and trailer parking/drop lot, as such the CAP would not be applicable to the proposed Project.

The Project's long-term operational GHG emissions would not exceed the significance threshold of 90,718.5 $MTCO_2e$/yr. Thus, the proposed Project would have a less than significant potential to conflict with any applicable plan, policy, or regulation of an agency for the purposes of reducing the emissions of GHGs. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during either construction or operation of the Ossum Wash. It is unlikely any hazardous materials would be stored on the Project site during construction. In addition, long-term operation of the Project would not require use of hazardous materials. The improvements would be installed within the Ossum Wash, and once installed, the Wash would continue to function as it does at present, but

with enhanced protections for the two belowground sewer lines traversing the Wash. As a result, the operation of the Project would therefore not involve routine transport, use, or disposal of hazardous materials.

VVWRA has developed safety standards and operational procedures for safe transport, use, and storage of its operational and maintenance materials that are potentially hazardous and that might be temporarily required at the new reservoir site in the future. These procedures will comply with all federal, state and local regulations will ensure that the Project operates in a manner that poses no substantial hazards to the public or the environment. Compliance with established federal, state, and VVWRA regulations is considered regulatory compliance and not unique mitigation under CEQA. Therefore, with regulatory compliance, potential impacts to the public or the environment through accidental release due to the routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation is required.

Thus, no greater potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials exists as a result of implementing the proposed Project. Overall, impacts are therefore less than significant. No mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – Construction activities associated with implementation of the proposed Project could create hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials used in construction activities and equipment. Construction activities may involve the use of adhesives, solvents, paints, thinners, petroleum products, and other chemicals. Cal/OSHA regulations provide for the proper labeling, storage, and handling of hazardous materials to reduce the potential harmful health effects that could result from worker exposure to hazardous materials. If not properly handled, however, accidental release of these substances could expose construction workers, degrade soils, or become entrained in stormwater runoff, resulting in adverse effects on the public or the environment. VVWRA would be required to comply with all relevant and applicable Federal, State, and local laws and regulations that pertain to the accidental release of hazardous materials during construction of proposed facilities such as California Health and Safety Code Sections 25500 et seq. Compliance with all applicable Federal, State, and local regulations can reduce potential impacts to the public or the environment regarding accidental release of hazardous materials to less than significant impact, but a contingency mitigation measure is provided to ensure accidental releases and any related contamination would not significantly affect the environment at facility locations, thereby avoiding a potentially significant impact. **MM HAZ-1**, would minimize the potential hazard to the public or environment due to accidental release.

HAZ-1 ***All accidental spills or discharge of hazardous material during construction activities shall be reported to the local Certified Unified Program Agencies (CUPA) and shall be remediated in compliance with applicable Federal, State, and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste shall be collected and disposed of at a licensed disposal or treatment facility. This measure shall be incorporated into SWPPP prepared for each future facility developed under the Project, or where an SWPPP is not required due Project size, shall be incorporated as a BMP. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the***

standard for future residential or public use of the site.

The use of hazardous materials and substances during construction would be subject to the Federal, State, and local health and safety requirements for the handling, storage, transportation, and disposal of hazardous materials, summarized in the Regulatory Setting. With compliance with these regulations, and preparation and implementation of **MM HAZ-1**, hazardous material impacts related to construction activities would be less than significant.

Long-term operation of the Project would not require use of hazardous materials. The improvements would be installed within the Ossum Wash, and once installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Hazardous materials would not be associated with the regular operation of the proposed Project. Therefore, operational impacts would be less than significant.

c. *Less Than Significant Impact* – The proposed Project site is not located within one quarter mile of a school; furthermore, it is not anticipated to emit hazardous emissions or handle hazardous materials or substances that would cause a significant impact to a local school. The nearest schools are Riverside Preparatory High School and Mojave River Academy located about one mile north of the Project site on Route 66. Given the safety measures in place for the potentially hazardous materials that may be required to construct the proposed Ossum Wash Improvements, it is not anticipated that the Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste during construction or operation in a quantity that would pose any danger to people adjacent to, or in the general vicinity of, the Project site, including schools. Therefore, the impacts of the proposed Project to this issue area would be considered less than significant and no mitigation is required.

d. *Less Than Significant Impact* – The proposed Project footprint is not located in an area that has been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result it will not create a significant hazard to the public or environment. According to the California State Waterboard's GeoTracker, which provides information regarding Leaking Underground Storage Tanks, there are no locations within the Project footprint identified as a Leaking Underground Storage Tank (LUST) site or Department of Toxic Substances Control (DTSC) site (**Figure IX-1** see GeoTracker). There are no locations within the Project footprint identified as a cleanup site as identified on the DTSC EnviroStor Map presented as **Figure IX-2**. Therefore, no potential exists for the proposed Project to encounter hazards related to an existing known hazardous contamination site. Furthermore, the nature of the proposed Project is not such that persons working or residing in the area would be exposed to any hazards from any nearby contaminated sites. Therefore, the proposed Ossum Wash Repair Project is not anticipated to create a significant hazard to the population or to the environment from their implementation. Impacts are considered less than significant. No mitigation is required.

e. *No Impact* – The Project site is not located within the Southern California Logistics Airport (SCLA) Land Use Plan, as shown on **Figure IX-3**, as the Airport is located about 2.5 miles to the west of the Project site. Due to the distance from the Southern California Logistics Airport and the lack of any habitable structures on the Project site, implementation of the Project would not result in an exposure to a safety hazard for the people working in the Project area. No impacts are anticipated

and no mitigation is required.

f. *No Impact* – The proposed Project is located within Ossum Wash in Victorville, CA. Ossum Wash runs North-South, flowing northerly to its confluence with the Mojave River, approximately 850-feet north of Turner Road. Road runs East-West and the Project area is located north of where the wash crosses Turner Road. It is not anticipated that that Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The installation of the proposed Ossum Wash Repair Project will require no work within nearby evacuation routes (Interstate 15, Highway 395, and Highway 18), which are the only roadways identified as emergency evacuation routes (refer to San Bernardino Countywide Plan Evacuation Route Map (**Figure IX-4**). Due to its location and point of access, there will be no potential to interfere with an emergency response or evacuation plan will occur during construction. At no time during construction of the proposed Project will any access to or along these roads be restricted. For additional information, please refer to the Transportation Section of this document, Section XVII.

Following construction, the operation of the Ossum Wash would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan as, once installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Impacts related to an adopted emergency plan would be less than significant during operation.

g. *No Impact* – The proposed improvements would be constructed primarily within the existing Ossum Wash, as previously described. CAL FIRE designates most of the areas within the Project area as being located outside of fire hazard severity zone (FHSZ), and is located within a Local Responsibility Area (LRA) due to the Project's location within the City of Victorville, outside of higher fire risk areas in the San Bernardino Mountains (**Figure IX-5**). Thus, the proposed Project is not located in a wildland fire hazard area. Additionally, the Project is in a rural area and is not adjacent to any urbanized areas or residences. There are no habitable structures proposed by the Project. Therefore, the proposed Project has no potential to expose people or structures to significant risk of loss, injury, or death involving wildland fires where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The operation of the Ossum Wash would not be constructed of flammable materials or involve any spark-producing activities, as the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Thus, operation of the proposed Project would have a no potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No impacts are anticipated and no mitigation is required.

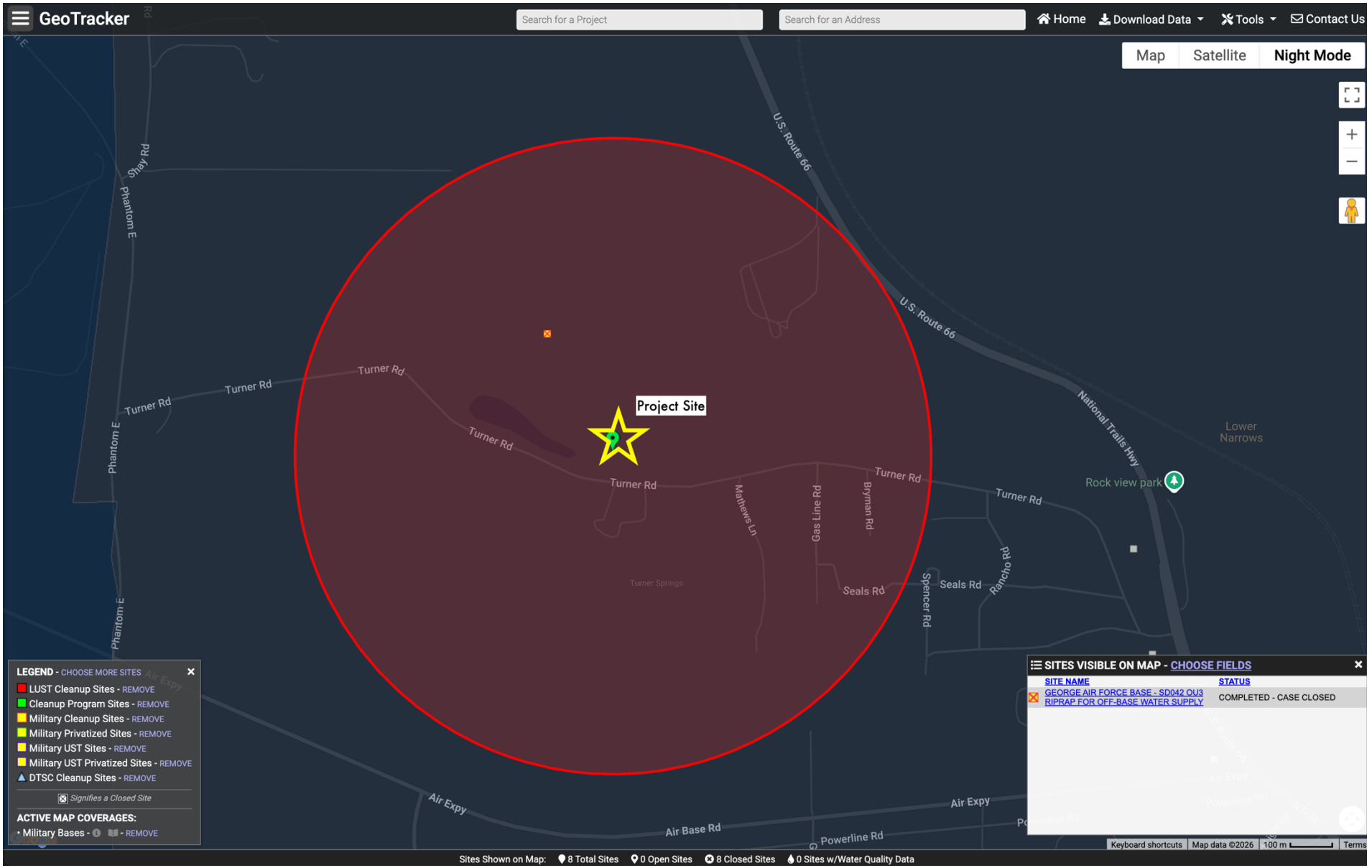


FIGURE IX-1

Tom Dodson & Associates
Environmental Consultant

GeoTracker Map

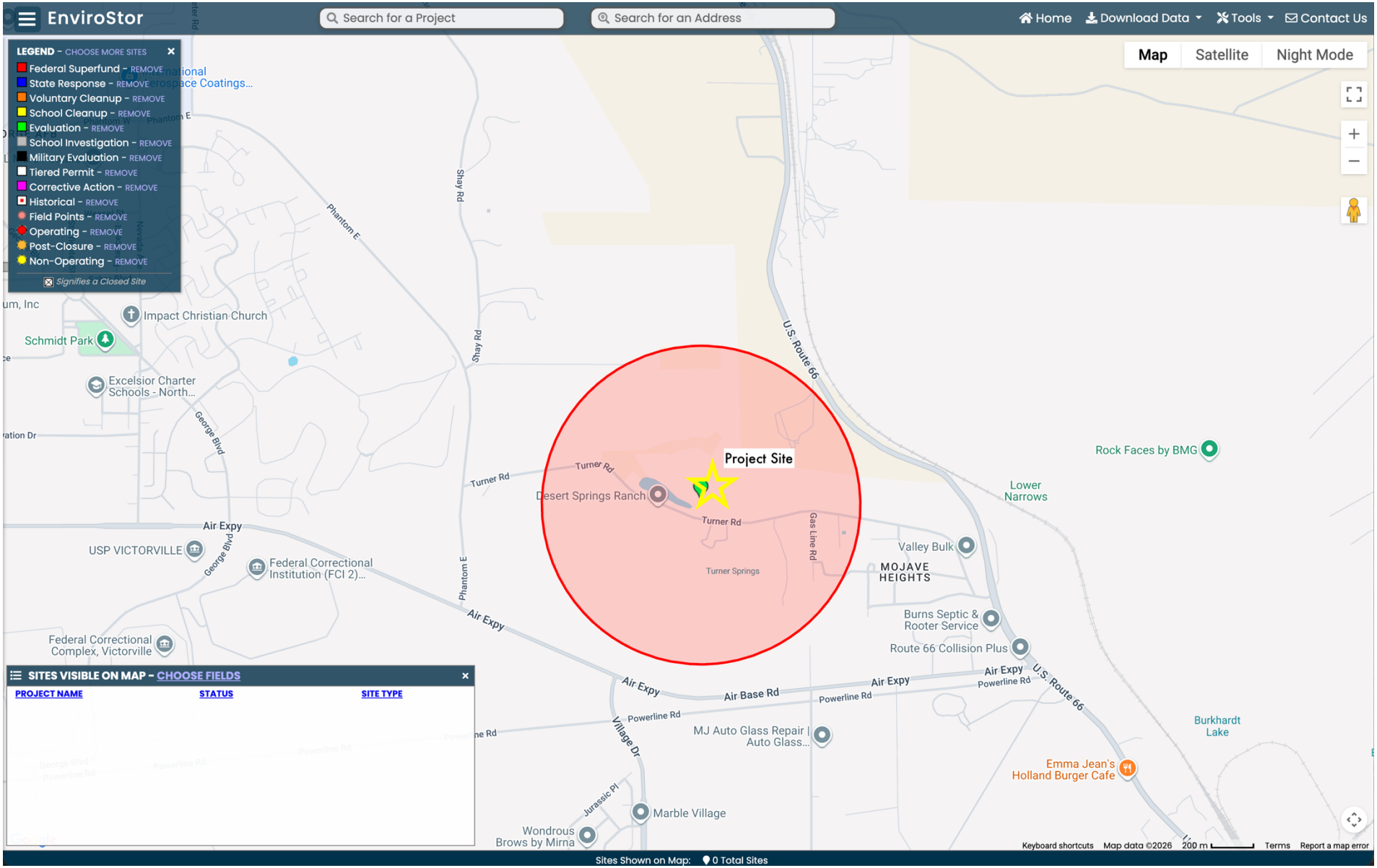


FIGURE IX-2

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EnviroStor Map

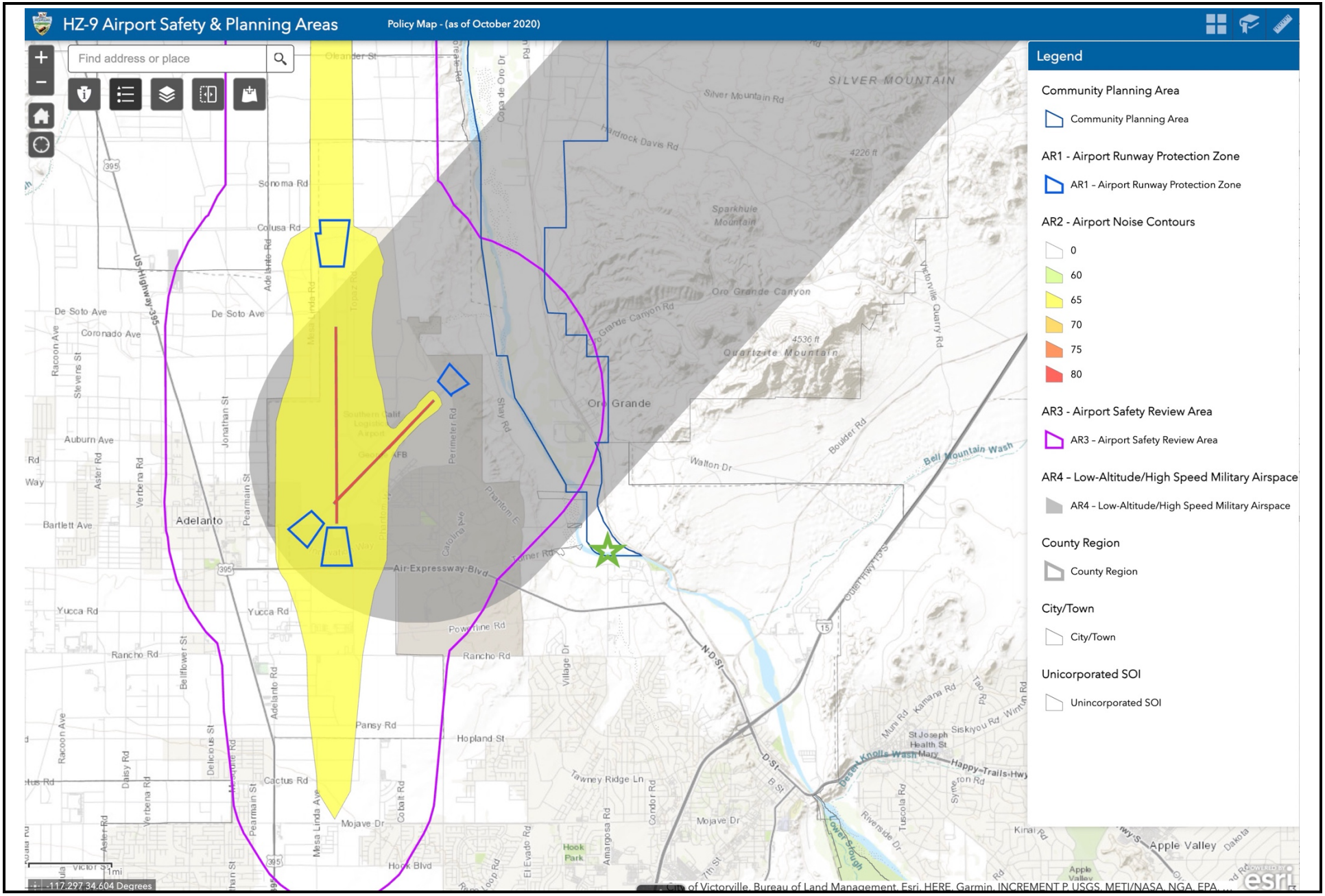


FIGURE IX-3

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Airport Safety & Planning Areas Map

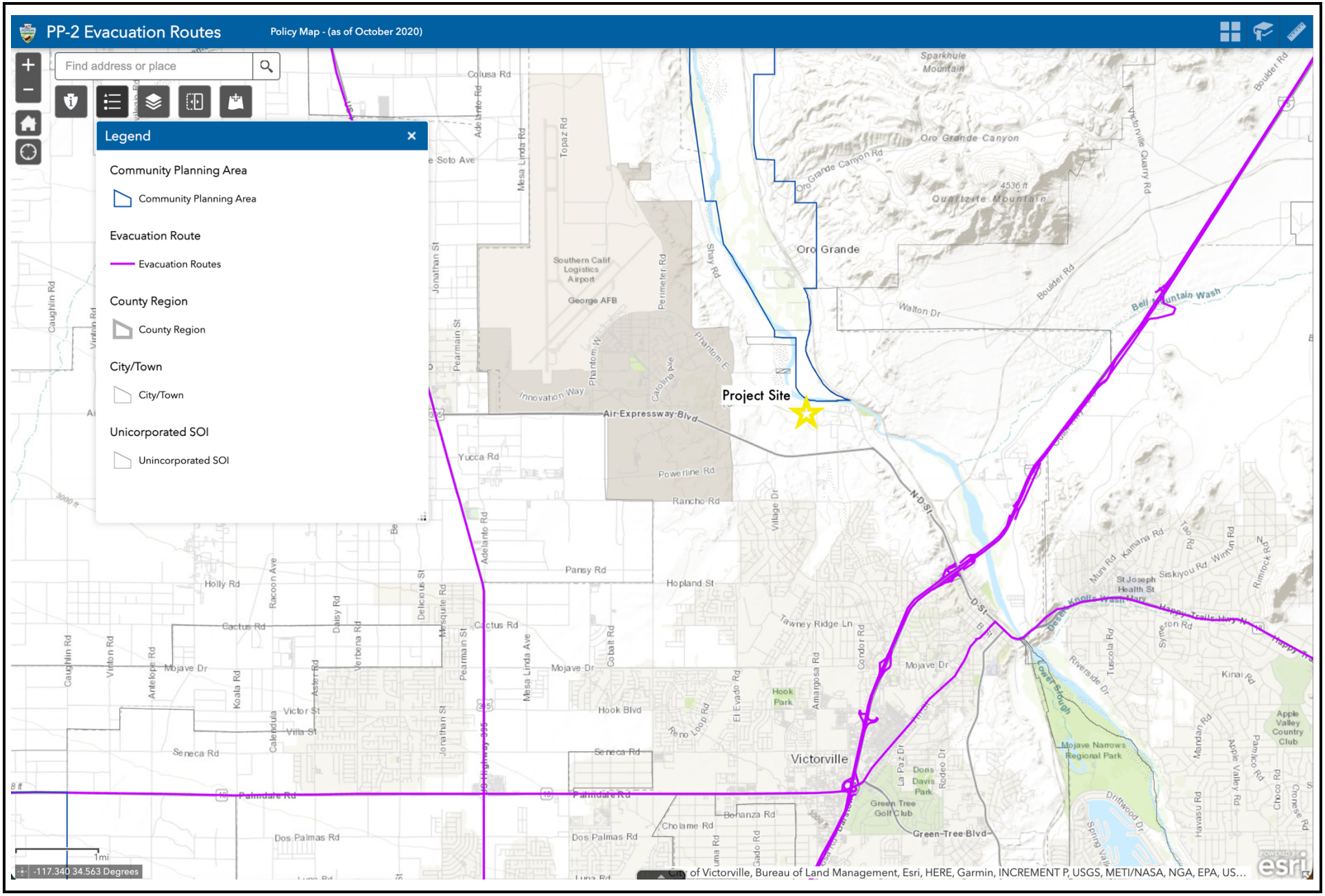


FIGURE IX-4

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Evacuation Routes Map

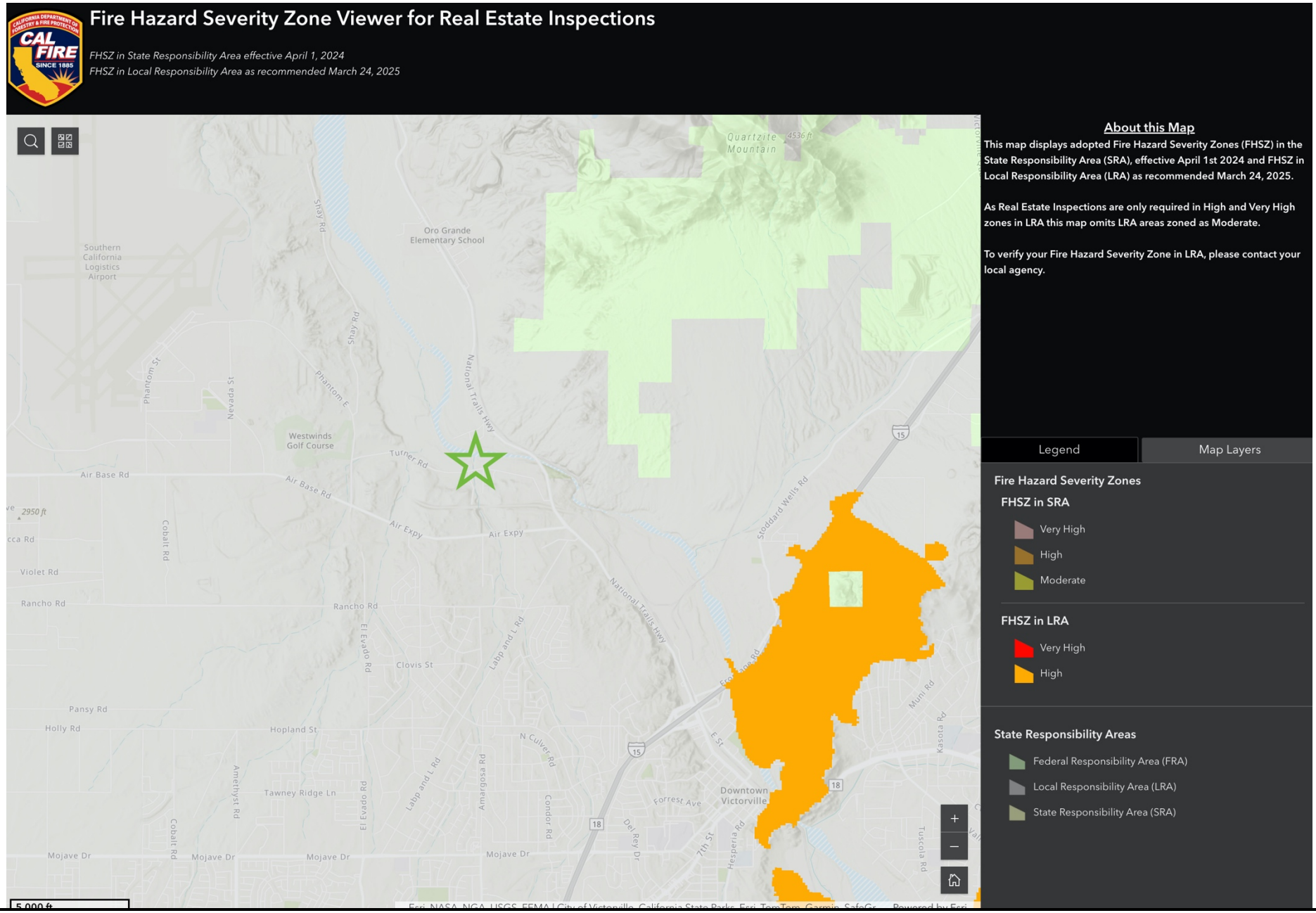


FIGURE IX-5

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CALFIRE Fire Hazard Severity Zone Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY: Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such 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 onsite or offsite?	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or,	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed Project is located within the planning area of the Lahontan Regional Water Quality Control Board (RWQCB). Three main sources of potential violation of water quality standards or waste discharge requirements are as follows: from generation of municipal wastewater; from stormwater runoff; and potential discharges of pollutants, such as accidental spills.

Construction of proposed Project would require the use of heavy equipment and construction-related chemicals, such as fuels, oils, grease, solvents and paints that would be stored in limited quantities onsite. In the absence of proper controls, these construction activities could result in accidental spills or disposal of potentially harmful materials used during construction that could wash into and pollute surface waters or groundwater. Materials that could potentially contaminate the construction area from a spill or leak include diesel fuel, gasoline, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and other fluids.

The Construction General Permit (CGP) would not apply to construction because the Project APE is less than one acre. Instead, the Project would be required to comply with minimum BMPs as specified by the San Bernardino County MS4 Permit, which would implement BMPs to provide erosion control, sediment control, and waste management strategies for construction sites. Without implementation of these BMPs, which would protect surface water quality during construction, a significant impact could occur. However, compliance with the San Bernardino MS4 Permit is mandatory, and therefore, compliance thereof would be required as part of implementation of the Project. Adherence to these conditions would ensure that potential water quality degradation associated with construction activities on sites less than one acre would be minimized to less than significant levels. Through compliance with the San Bernardino MS4 Permit for Projects under one acre during construction, impacts would be less than significant.

While the majority of the impacts to surface water quality can be minimized through compliance with mandatory regulations, it is imperative that such regulations are reinforced through the implementation of specific mitigation measures designed to ensure that full compliance with these regulations is achieved by the Project, thereby avoiding violations to surface water quality standards. Therefore, the following mitigation measures shall be implemented to prevent any violation of any water quality standards or waste discharge requirements or otherwise substantially degrading surface or groundwater quality.

HYD-1 ***Prior to the commencement of construction of the Project, VVWRA shall require implementation of and construction contractor(s) shall select best management practices (BMPs) to achieve a reduction in pollutants from stormwater discharge to the maximum extent practicable during construction, and to control urban runoff after the Project is in operation. Examples of BMP(s) that would achieve a reduction in pollutants include, but are not limited to:***

- ***The use of silt fences or coir rolls;***
- ***The use of temporary stormwater desilting or retention basins;***
- ***The use of water bars to reduce the velocity of stormwater runoff;***
- ***The use of wheel washers on construction equipment leaving the site;***
- ***The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;***
- ***The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and***
- ***Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.***

MM HYD-1 would require implementation of Project BMPs that would be comparable to the requirements of the CGP and SWPPP. This mitigation measure would further ensure that no water quality standards are violated through targeted stormwater pollution control.

The improvements would be installed within the Ossum Wash, and once installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Once operational, the Ossum Wash would have no potential to violate water quality standards or waste discharge requirements. Therefore, with no anticipated operational impacts or substantial change in the environment from implementation of the proposed Project, implementation of these mandatory Plans and their BMPs, as well as **MM HYD-1** above, will prevent a violation of any water quality standards or waste discharge.

b. *Less Than Significant Impact* – The proposed Project will not adversely impact groundwater resources. The installation of the riprap associated with the proposed Project improvements would require small quantities of water to control fugitive dust and this can be provided from potable water from VVWRA's facility, which is currently served by two groundwater extraction wells serving VVWRA. In the short term, if any potable water must be used it will be such a small quantity (about 5,000 gallons per day of construction/grading) that no significant effect on the Upper Mojave River Valley Groundwater Basin will occur. The Project is located in an area where groundwater is located at an estimated 6 feet to 27 feet below the ground surface. Once the proposed Wash Repairs are installed, it is not anticipated that the Project would substantially interfere with groundwater recharge as the Ossum Wash will continue to allow for percolation beneath the riprap, and the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. As the aboveground drainage patterns and impervious areas would generally be maintained and as the Project does not propose to extract groundwater from the underlying groundwater basin beyond that which is presently extracted by VVWRA's potable water wells to serve potable water needs of their operations, it is not anticipated that the Project would decrease groundwater supplies. It would only require minimal water use for fugitive dust control for the temporary duration of construction. Therefore, the Project is not anticipated to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

c

(i-iii). *Less Than Significant With Mitigation Incorporated* – The development of the proposed Project could alter the existing drainage patterns aboveground. The purpose of the proposed Project is to mitigate the risk of pipe exposure and damage within Ossum Wash through installation of various types of riprap within the channel. A hydraulic analysis was performed to determine the appropriate riprap size and placement within the Wash to ensure that the riprap does not adversely alter the existing drainage pattern of the Wash. The hydraulic analysis is found in **Appendix 1** to this Initial Study. Through the implementation of the Project as designed in compliance with the hydraulic analysis, potential erosion or siltation onsite or offsite; substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or, 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 would be reduced and discharges from the Project operation would not exceed the capacity of existing storm water drainage systems.

For construction of the Project, the CGP would not apply to construction because the Project APE is less than one acre. Instead, the Project would be required to comply with minimum BMPs as specified by the San Bernardino County MS4 Permit, which would implement BMPs to provide erosion control, sediment control, and waste management strategies for construction sites. **MM HYD-1** would require implementation of BMPs for Projects of less than one acre in size that would be comparable to the requirements of the CGP and SWPPP, thereby avoiding a potentially significant impact under this issue. Each of these permits and plans would require the implementation of BMPs that manage overland runoff from construction sites and establish permanent drainage pathways to stabilized outlets. With implementation of mitigation, BMPs and compliance with conditions of required permits governing storm water runoff from construction sites, potential erosion or siltation onsite or offsite; substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or, 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 would be reduced and discharges from construction would not exceed the capacity of existing storm water drainage systems. Impacts would be less than significant through the implementation of **MM HYD-1**.

c. iv. Impede or redirect flood flows?

Less Than Significant Impact – As shown on the Federal Emergency Management Agency (FEMA) Federal Insurance Rate Map (FIRM) provided as **Figure X-1**, the Project site is located within Zone A and within a Regulatory Floodway, which represents areas of a 1% (100-year) annual chance flood. Furthermore, development of the Project, which consists of Wash improvements within an existing waterway, is not anticipated to redirect or impede flood flow at the Project site, particularly given that the Project has been designed and will be implemented in accordance with the hydraulic analysis that was performed to determine the appropriate riprap size and placement within the Wash to ensure that the riprap does not adversely alter the existing drainage pattern of the Wash. As such, implementation of the proposed Project would have a less than significant potential to impede or redirect flood flows. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – Please refer to response IX(c) above. The proposed Project is not located within a tsunami, or seiche zone. As stated above, the Project site is located within Zone A and within a Regulatory Floodway, which represents areas of a 1% (100-year) annual chance flood. During construction, runoff will be managed through implementation of the implementation of **MM HYD-1**, which will ensure that the risk of release of pollutants from the Project site is less than significant. This measure would control urban runoff and thereby reduce potential on- and off-site flooding. With implementation of mitigation and BMPs, compliance with conditions of required permits governing storm water runoff from construction sites, the potential to risk of release of pollutants during construction due to flooding on or offsite is less than significant with the implementation of mitigation.

As stated above, during operation of the proposed Project, it is not anticipated that the onsite flood hazards would be altered when compared to that which exists at present. This is because once installed, the Wash would continue to function as it does at present, but with enhanced protections

for the two belowground sewer lines traversing the Wash. Once operational, the Ossum Wash would have no potential to risk release of pollutants due to Project inundation.

Further, the Project is located more than 75 miles from the Pacific Ocean, which eliminates the potential for a tsunami to impact the Project area. Additionally, a seiche would not occur within the vicinity of the Project because no lakes or enclosed bodies of water exist near the site that could be impacted by such an event, and the Project does not propose any habitable structures. As such, with the implementation of **MM HYD-1** above, the proposed Project would have a less than significant potential to risk release of pollutants due to Project inundation.

e. *Less Than Significant Impact* – Please refer to the discussion under issue X(b) above. The Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline.[6] The Mojave River Basin is under very low priority. As the Mojave River Basin is under very low priority, it is currently not required to prepare a sustainable groundwater management plan because it is adjudicated and the Project will not interfere with the overall water quality of the Mojave River Basin. The Mojave Basin Area (MBA) Watermaster manages transfers from the Groundwater Basin and assesses a fee commensurate with the amount of water extracted. Though the Groundwater Basin has several sub-basins that have experienced overdraft in the last 10 years, the Watermaster replaces overdrafts through fees collected from water users that is used to purchase additional water supplied through the State Water Project. Furthermore, compliance with the State water conservation measures is enforced through local water agencies. As such, it is not anticipated that the proposed Project would have a significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

[6] California Department of Water Resources, 2026. Sustainable Groundwater Management Act (SGMA) https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management (Accessed 07/10/26)

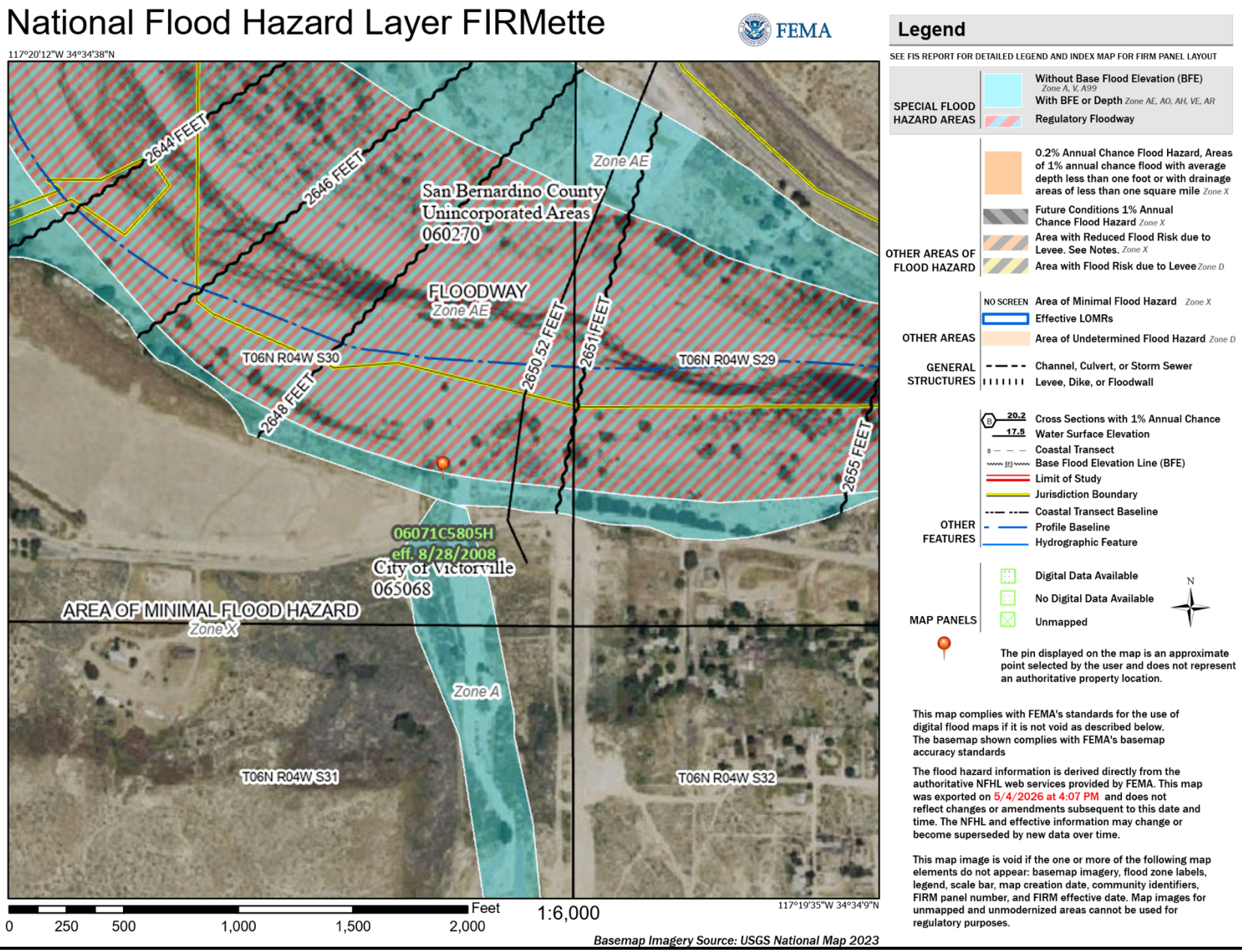


FIGURE X-1

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FEMA Flood Hazard Map

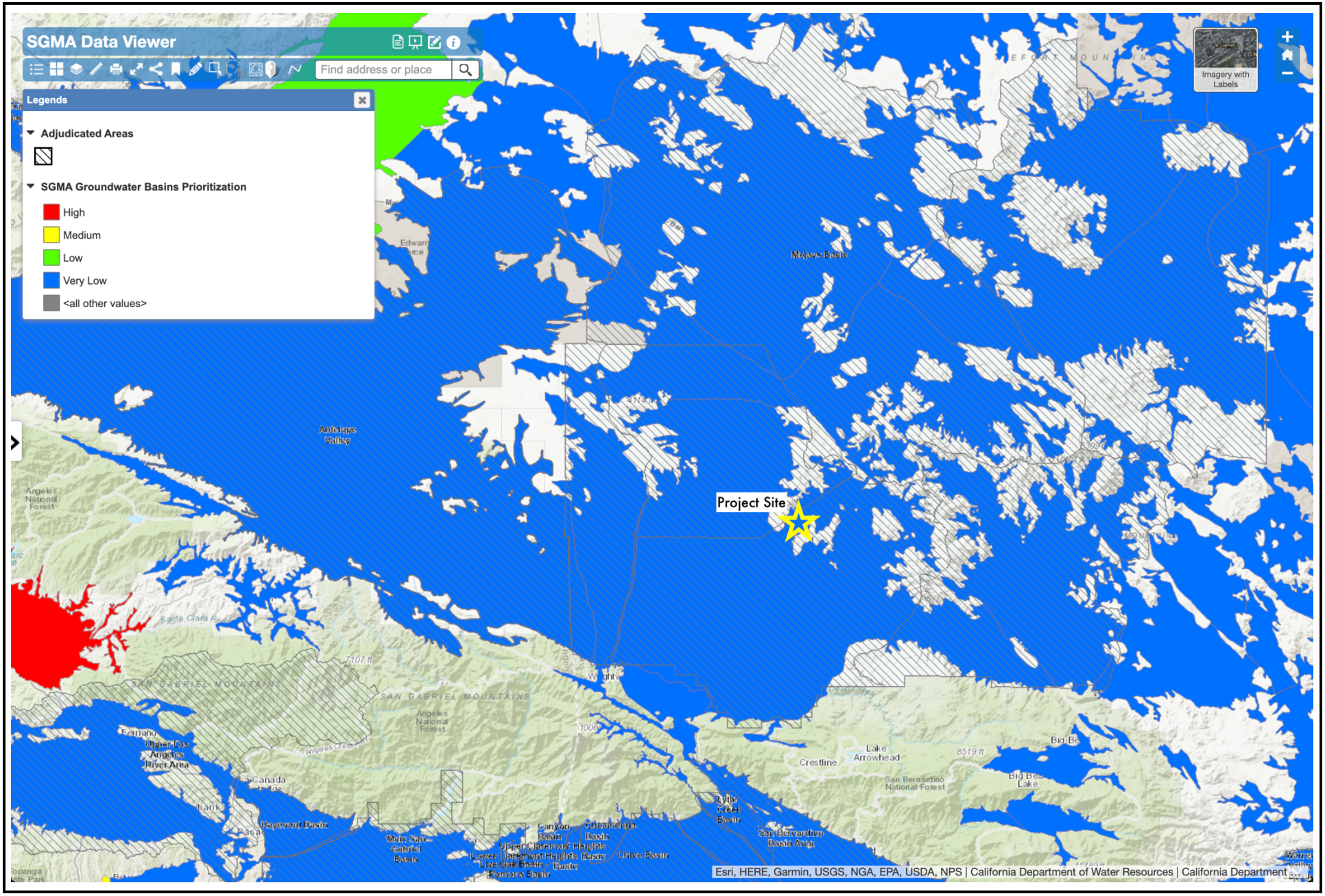


FIGURE X-2

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SGMA Groundwater Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *No Impact* – The Project site and surrounding area do not constitute an established community. There are only a few scattered residences in the surrounding area. Further, the Project would simply implement improvements to Ossum Wash, and once operational, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Therefore, implementation of the proposed Ossum Wash Repair Project would not physically divide an established community. There would be no impact and no mitigation is required.

b. *No Impact* – The Project site has a General Plan land use designation of Open Space and is zoned for Exclusive Agriculture. The properties around the site are also designated Open Space and zoned for Exclusive Agriculture, although there are some parcels to the south that are zoned Specific Plan and a few zoned Single Family Residential (see Table 3). The Wash repairs proposed by the Project are consistent and compatible with these land use and zoning designations. The Project is consistent with the Air Quality Management Plan because it does not propose any uses that would increase the area housing, population, or employment. For similar reasons it is consistent with SCAG's Connect SoCal regional plan previously known as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). There are no other local or regional plans that would be impacted by the Project due to its limited extent and the nature of its improvements. Therefore, the Project will not 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. There are no impacts and no mitigation required under this issue.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a&b. *No Impact* – The proposed Project will be developed within an existing active desert wash that flows into the Mojave River to the north. A review of the Victorville General Plan Resource Chapter indicates that the proposed Project is designated Mineral Resource Zone 2b (MRZ-2b) under the Surface Mining and Reclamation Act of 1975 (SMARA). The MRZ-2b designation means the site has "high likelihood of significant aggregate deposit." The site is proximate to the Mojave River channel which is also designated MRZ-2a which means it has known or high likely location of significant mineral resources (in this case, construction grade aggregate – sand and gravel). The area to the north of the Project site contains several cement plants, but these plants do not extend to the Project area. No specific plan or other land use plan is in place that would delineate important mineral resources at the Project site. Further, the proposed Project would not preclude the mining of the underlying materials within the Ossum Wash from being mined in the future, and would also not change the underlying use of the Ossum Wash once the proposed improvements are installed. Therefore, the development of the Project will not cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources within the City. No impacts would occur and no mitigation is required.

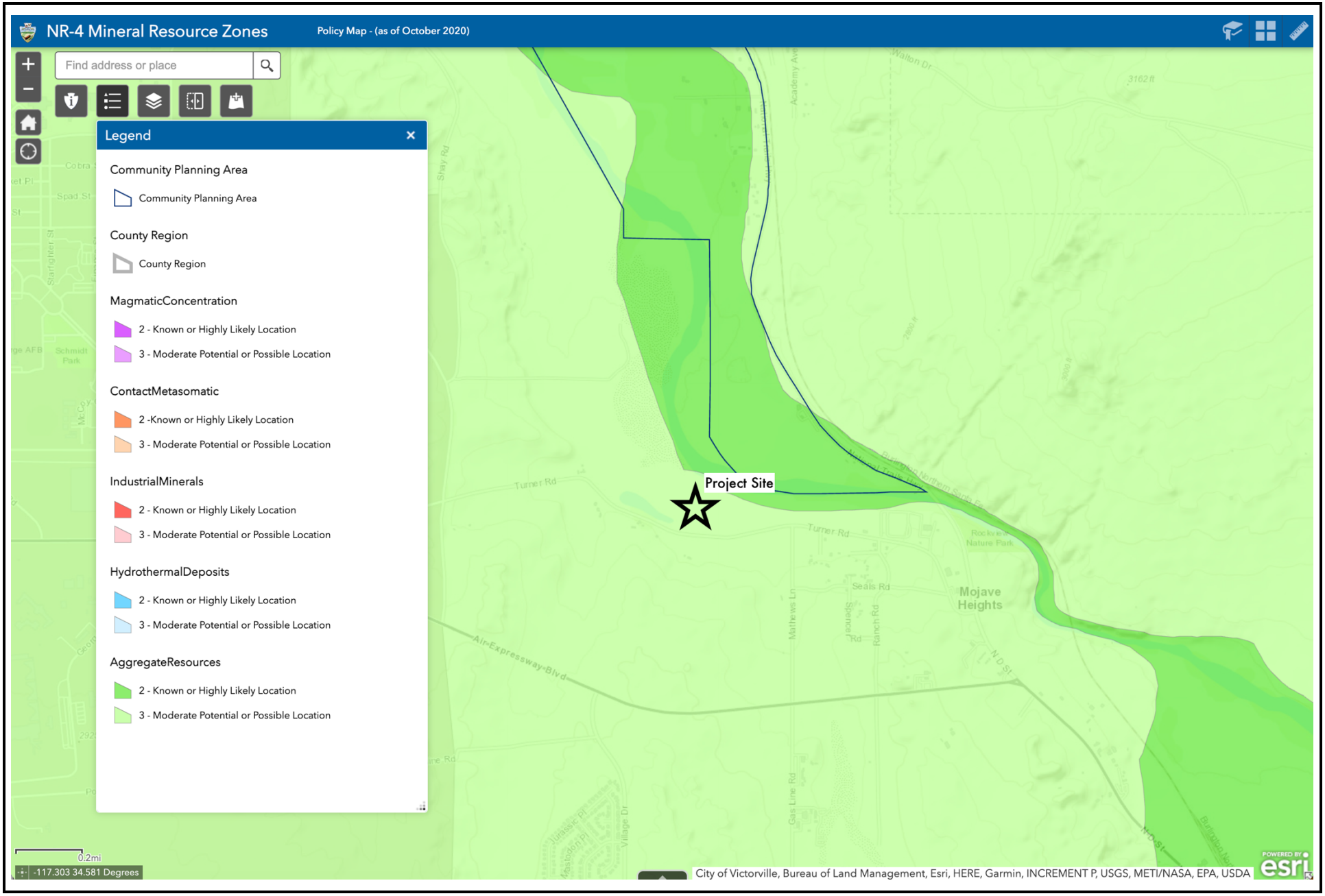


FIGURE XII-1

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Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a 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?	☐	☐	☒	☐

SUBSTANTIATION

Background

Noise is generally described as unwanted sound. The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called "A-weighting," written as "dBA."

Leq is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit is the decibel (dB). The most common averaging period for Leq is hourly.

Because community receptors are more sensitive to unwanted noise intrusion during more sensitive evening and nighttime hours, state law requires that an artificial dBA increment be added to quiet time noise levels. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multiple family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable"

up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

Applicable Noise Standards

City of Victorville General Plan Noise Element

The City of Victorville General Plan Noise Element is intended to limit exposure of the community to excessive noise levels. The City of Victorville General Plan Noise Element land use compatibility standards specify the noise levels allowable for new developments impacted by transportation noise sources. The City's compatibility criteria, found in Table XIII-1 below, extracted from the City's General Plan, identify the criteria as shown on, as shown on Exhibit XIII-1. When the unmitigated exterior noise levels approach 60 dBA CNEL residential land uses are considered normally acceptable. With exterior noise levels ranging from 65 to 75 dBA CNEL, institutional land uses are considered conditionally acceptable, and with exterior noise levels greater than 75 dBA CNEL, they are considered normally unacceptable.

Exhibit XIII-1: LAND USE NOISE COMPATIBILITY CRITERIA

Table N-3
Victorville Land Use Compatibility Standards

	Community Noise Exposure Ldn or CNEL, dB						
Land Use Categories	55	60	65	70	75	80 +	
Residential - Low Density, Single Family, Duplex, Multi-family, Mobile Home	1	1	2	2	3	4	4
Transient Lodging - Motels, Hotels	1	1	2	2	3	3	4
Schools, Libraries, Churches, Hospitals, Nursing Homes	1	1	2	3	3	4	4
Auditoriums, Concert Halls, Amphitheaters	2	2	3	3	4	4	4
Sports Arena, Outdoor Spectator Sports	2	2	2	2	3	3	3
Playgrounds, Neighborhood Parks	1	1	1	2	3	3	3
Golf Courses, Riding Stables, Water Recreation, Cemeteries	1	1	1	2	2	4	4
Office Buildings, Business Commercial, Retail Commercial and Professional	1	1	1	2	2	3	3
Industrial, Manufacturing, Utilities	1	1	1	1	2	2	2
Agriculture	1	1	1	1	1	1	1

Legend:
1. NORMALLY ACCEPTABLE: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
2. CONDITIONALLY ACCEPTABLE: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and Schools, Libraries, Churches, Hospitals, Nursing Homes 1 needed noise insulation features included in the design. Conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice.
3. NORMALLY UNACCEPTABLE: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
4. CLEARLY UNACCEPTABLE: New construction or development should generally not be undertaken.

Source: City of Victorville General Plan Noise Element, Table N-3.

Construction Noise Standards
Section 13.01.060.9 of the City of Victorville General Municipal Code indicates that construction activity is considered exempt from the noise level standards on private properties that are determined by the director of building and safety to be essential to the completion of a Project. However, neither the City of Victorville General Plan or Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a *substantial temporary or periodic noise increase*. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts, as discussed below.

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction Project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA L_{eq}.

Construction Vibration Standards
Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the American Jerky Company Dog Treat Manufacturing Plant, vibration-generating activities are appropriately evaluated against standards established under a City's Municipal Code, if such standards exist. However, the City of Victorville does not identify specific vibration level limits. Therefore, this analysis uses the FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are an infrequent number of events per day. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 80 VdB at residences and buildings where people normally sleep, and 83 VdB at other institutional buildings.[7] The 65 VdB threshold applies to typical land uses where vibration would interfere with interior operations, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations.

Impact Analysis

a. *Less than Significant With Mitigation Incorporated* – The proposed Project would cause a temporary increase in localized noise during construction by the use of medium- to heavy-duty diesel powered equipment and vehicles. Once completed, the Project would not generate any noise or any noise-related impacts on surrounding uses. The nearest sensitive receptors (land uses with sensitive occupancy like children or the elderly) in the Project area are located about 686 feet to the southeast,

[7] FTA, 2006. Transit Noise and Vibration Impact Assessment
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (Accessed 7/19/25)

and 1,150 feet to the southwest. There are also no land uses in the surrounding area that generate large amounts of noise like a freeway or industrial facility.

Short-Term Construction Noise

Short-term construction noise impacts associated with the proposed Project would occur in phases as the Project site is developed. Table XIII-1, Typical Construction Noise Levels, shows the estimated noise levels for the various types of construction equipment that would be used on the Project site.

Table XIII-1: Typical Construction Noise Levels

Construction Phase	Type of Equipment	Noise Levels (dBA) at 50 feet
Grading	Compactors	82
	Front Loaders	85
	Backhoes	80
	Trucks	88
Material Handling	Concrete Mixer	85
Stationary Equipment	Generators	81
	Compressors	81
Other Equipment	Vibrators	76
	Saws	76

Source: Referenced Noise Levels from the FTA Noise and Vibration Impact Assessment (Table 12-1). https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (accessed 07/11/26)

The earth-moving sources are the noisiest type of equipment typically ranging up to 88 dB at 50 feet from the source. The nearest sensitive receptor property line is approximately 686 feet south of the Project's southern boundary. At 686 feet from the source, the loudest potential construction source (88 dBA) would attenuate to 65.25 dBA at the nearest sensitive receptor property line.[8] Section 13.01.060.9 of the City of Victorville General Municipal Code indicates that construction activity is considered exempt from the noise level standards on private properties that are determined by the director of building and safety to be essential to the completion of a Project. Project construction will be limited to daytime hours and specific days in compliance with the City's Municipal Code. Utilizing the FTA Noise and Vibration Impact Assessment reference noise levels, and applying the attenuation factor at a distance of 686 feet, the proposed Project would not generate noise in excess of the FTA daytime exterior construction noise level of 80 dBA L_{eq}. Thus, the proposed Project would be constructed in compliance with the County's Noise Performance Standards and below the FTA construction noise threshold of 80 dBA L_{eq}, and therefore construction of the Project would be less than significant.

In order to further minimize the construction related noise generation to **MMs NOI-1 through NOI-7** are recommended**.** These measures are anticipated to reduce the construction-related noise levels at nearby receptors to the maximum extent feasible and ensure that construction noise falls below the identified 80 DBA L_{eq} construction noise level significance threshold.

[8] Omni Calculator, 2026. Distance Attenuation Calculator. https://www.omnicalculator.com/physics/distance-attenuation (Accessed 02/10/26)

NOI-1 ***VVWRA shall require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.***

NOI-2 ***Equipment not in use for five minutes shall be shut off.***

NOI-3 ***Equipment shall be maintained and operated such that loads are secured from rattling or banging.***

NOI-4 ***Where commercially available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.***

NOI-5 ***Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment. This measure shall be included in the construction contract as a contract specification by the contractor.***

NOI-6 ***No radios or other sound equipment shall be used at this site unless required for emergency response by the contractor.***

NOI-7 ***Construction shall be limited to the hours of 7 AM and 6 PM Monday through Friday, 8 AM and 5 PM Saturday, and shall not be allowed on Sundays or any Federal Holiday unless an emergency warrants the continuation of construction outside of the aforementioned hours.***

Through compliance with the above recommended mitigation measure, in addition to regulatory compliance, construction noise impacts of the Project on surrounding uses would be reduced to less than significant levels.

Long-Term Construction Noise

The improvements would be installed within the Ossum Wash, and once installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Once operational, the Ossum Wash would have no potential to increase noise generated by its continued operation as a Wash. No operational noise impacts would occur as a result of Project implementation.

Conclusion

Therefore, the Project would temporarily increase ambient noise levels during construction which would cease upon completion of the work. There would be no operational noise impacts. Thus, impacts would be less than significant through the implementation of contingency **MMs NOI-1 through NOI-7**.

b. *Less than Significant Impact* – Similar to the impacts discussed in Threshold XIII.a above, construction activities would temporarily increase localized vibration during excavation and placement of rip-rap in the wash. Once completed, the Project would not generate any vibration

because it has no occupied structures or powered equipment that would generate noise during operation.

Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second) and discussed in decibel (VdB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The background vibration-velocity level in residential areas (from ongoing activities in a residential area such as cars driving by on a paved road, etc.) is generally 50 VdB[9], while the groundborne vibration directly adjacent to an industrial facility requiring movement of heavy machinery might be greater. Groundborne vibration is normally perceptible to humans at approximately 65 VdB, while 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible. Construction activity can result in varying degrees of groundborne vibration but is generally associated with pile driving and rock blasting. Other construction equipment—such as air compressors, light trucks, hydraulic loaders, etc.—generate little or no ground vibration. Table XIII-2, Typical Vibration Impacts, shows the kind of vibration impacts that can occur around typical construction sites.

Table XIII-2: Typical Vibration Impacts

Construction Activity	Distance to Nearest Structure (feet)	Duration	Calculated Vibration Level PPV[1] (in/sec)	Approximate VdB	Damage Potential Level	Annoyance Criteria Level
Large Bulldozer	25	Continuous/Frequent	0.089	87	Extremely fragile historic buildings, ruins, ancient monuments	Distinctly Perceptible
Vibratory Roller	25	Continuous/Frequent	0.210	94	Historic and old buildings	Strongly Perceptible
Loaded Trucks	25	Continuous/Frequent	0.076	86	No Impact	Distinctly Perceptible

Source; Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018
[1]PPV = Peak Particle Velocity

In the short term, it is possible that groundbreaking construction equipment and other equipment required to construct the whole of the Project may have some potential to create some vibration at that traverses the property line, but given the distance from which sensitive receptors are located in relationship to the vibration generating activities, as described in the Project description, it is not anticipated that vibration would occur at a strongly perceptible level at any nearby sensitive receptor.

[9] FTA, 2006. Transit Noise and Vibration Impact Assessment
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (Accessed 7/19/25)

In terms of groundborne vibration impacts associated with human annoyance, this analysis uses the FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are an infrequent number of events per day. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 80 VdB at residences and buildings where people normally sleep, and 83 VdB at other institutional buildings.[10] The 65 VdB threshold applies to typical land uses where vibration would interfere with interior operations, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Based on a review of the Project footprint, such that the Project site presently includes existing historic structures, it is anticipated that the 65 VdB threshold would be applicable to this Project. The 80 VdB threshold applies to all residential land uses and any buildings where people sleep, such as hotels and hospitals. The 83 VdB threshold applies to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. Depending on how close an actual receptor location is to the Project footprint, and the type of building the receptor, it is possible that the vibration levels at a receptor location could exceed the FTA's vibration thresholds for building damage and human annoyance. As such, based on the distance to the nearest sensitive receptors, including historic structure sensitive receptors onsite, vibration impacts during construction associated with the proposed Project on existing nearby receptors would not require mitigation to ensure that the FTA vibration impact threshold is not exceeded by Project implementation. This is because the greatest VdB source during construction would equal 94 VdB at 25 feet, but the nearest sensitive receptor structure is located at approximately 742 feet from the source, thereby generating 64.55 VdB at the sensitive receptor structure. Therefore, the Project would not generate excessive groundborne vibration or groundborne noise levels. No mitigation is required.

c. *Less than Significant Impact* – The Project site is not located within the Southern California Logistics Airport (SCLA) Land Use Plan, nor is it located within the Airport noise contours, as shown on **Figure IX-3**, as the Airport is located about 2.5 miles to the west of the Project site. Due to the distance from the Southern California Logistics Airport and the lack of any habitable structures on the Project site, implementation of the Project would not expose people residing or working in the Project area to excessive noise levels. Impacts would be less than significant and no mitigation is required.

[10] FTA, 2006. Transit Noise and Vibration Impact Assessment https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (Accessed 09/19/25)

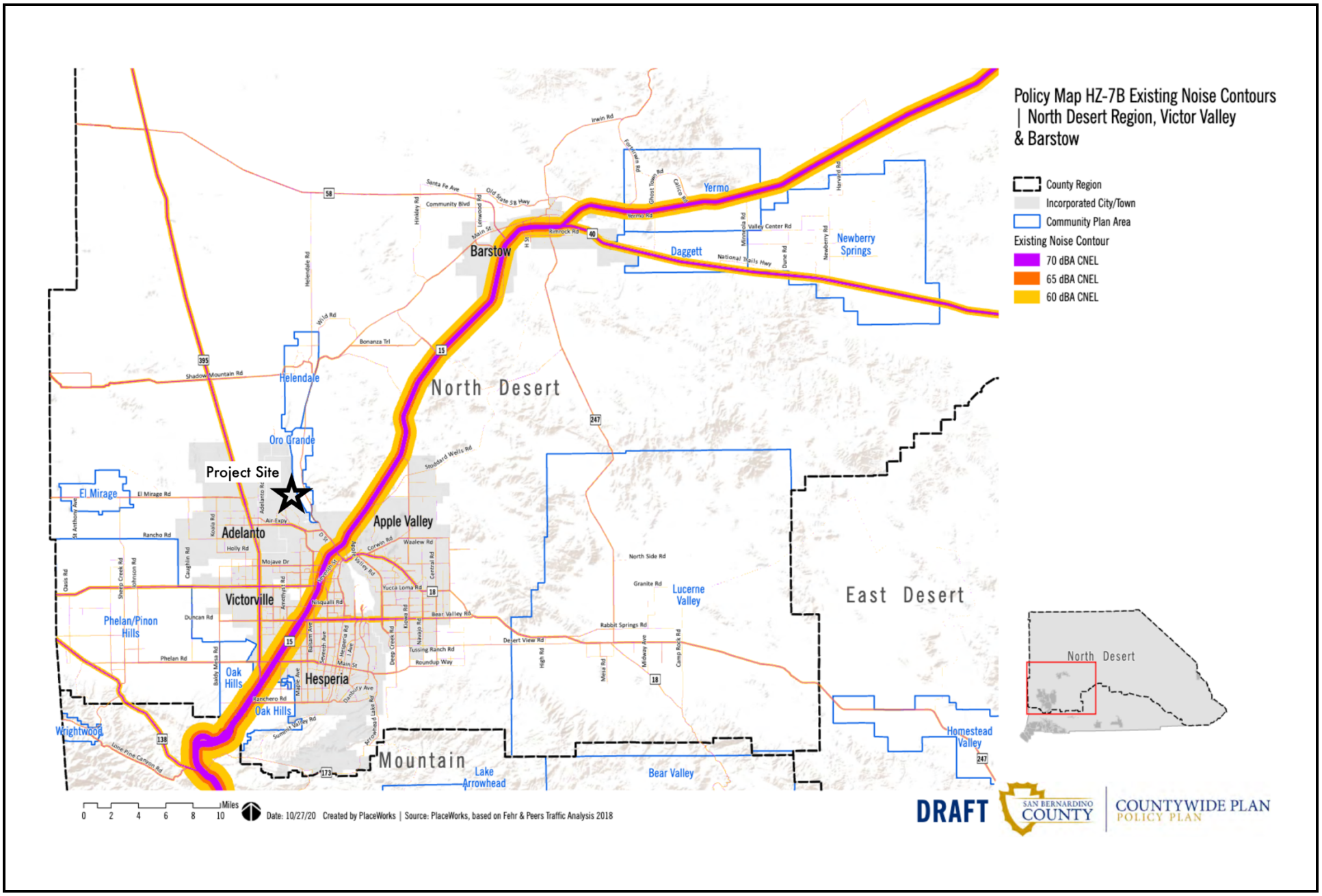


FIGURE XIII-1

Tom Dodson & Associates
Environmental Consultant

Noise Contours (Existing)

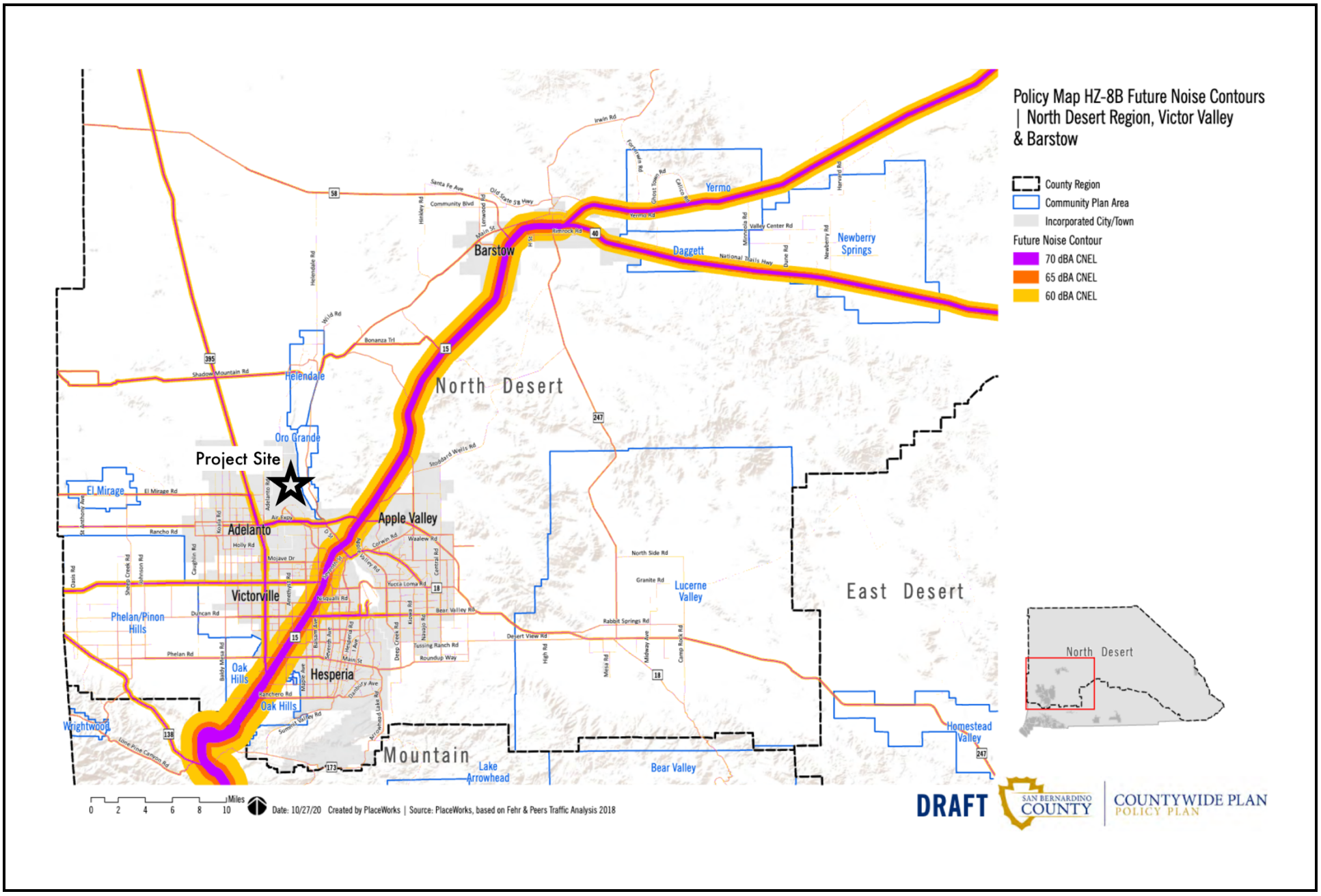


FIGURE XIII-2

Tom Dodson & Associates
Environmental Consultant

Noise Contours (Future)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the Project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *No Impact* – The Project will have workers onsite during construction activities, but it proposes no new buildings or occupied structures. The proposed Project is not anticipated to employ additional persons; however, the Project would require a temporary construction work force of up to 10 persons. It is unknown whether the new employees will be drawn from the general area or will bring new residents to the Project area. According to the Southern California Association of Governments (SCAG) Connect SoCal (the Regional Transportation Plan Sustainable Communities Strategies [RTP/SCS]), the total population within Victorville was 134,300 persons in 2019, with the population projected to be 152,800 in 2035 and 180,000 in 2050.[11] Therefore, the proposed Project would create a potential for 10 more temporary opportunities for employment during construction, which is only an increase in population of 0.0075% from the 2019 population if each of the 10 temporary employees are new residents to Victorville for the duration of the construction of the proposed Expansion Project. Given that the SCAG Connect SoCal indicates that the planned population is anticipated to grow by about 55,700 persons by 2050, the potential increase in residents is well within the planned population growth within the City of Victorville. Thus, based on the type of Project and the small, temporary increment of potential population the population generation associated with Project implementation, the proposed Project will not induce substantial population growth that exceeds either local or regional projections. No impacts will occur; therefore, no mitigation is required.

b. *No Impact* – The Project site does not contain any existing housing no it is planned to support any housing or occupied structures. Therefore, it would not generate a need for any replacement housing elsewhere. No impacts will occur; therefore, no mitigation is required.

[11] SCAG, 2026. https://scag.ca.gov/local-data-exchange#:~:text=available%20in%20an-,Excel%20File,-. (Accessed 07/13/26)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The nearest fire station serving the Project is approximately one mile away from the Project site, located at the Southern California Logistics Airport. The City is served by the Victorville Fire Department (VFD), and the SCLA fire station is Station #311 #319, located at 16200 Desert Knoll Drive Victorville, CA 92395 18550 Readiness Street, Victorville, CA 92394. The VFD provides fire protection and emergency medical services for the City.

The Project site is a vacant desert wash that periodically floods during heavy rain events. The Project would install flood protection improvements for two existing underground sewer pipelines, both in the channel and along the banks of the wash. If a fire were to occur during construction (e.g., overheated equipment or vehicle) the SBCFD would respond, if summoned. Once complete, the Project would have no improvements or structures that could catch fire so it would put little or no demand on the SBCFD for increased fire protection services. Impacts would be less than significant and no mitigation required.

b. *Less Than Significant Impact* – The City receives police services through the San Bernardino County Sheriff Department. The Victorville Police Department is staffed by the San Bernardino County Sheriff's Department (SBCSD) and is responsible for providing public safety to a geographical area of approximately 74 square miles with a population of approximately 115,000 residents. The Department enforces local, state, and federal laws; performs investigations and makes arrests; administers emergency medical treatment; and responds to City emergencies. The sheriff station is located at 14200 Amargosa Road, Victorville, CA 92392. The proposed Project will not include the

kind of uses or activities that would likely attract criminal activity, except for random trespass and theft during construction; however, any random trespass is unlikely because the construction equipment would remain fenced off from public access. Ossum Wash will continue to operate as it does at present once the improvements are installed, and these improvements would not generate greater demand for police protection. Therefore, implementation of the proposed Project would not substantially increase the demand for law enforcement services. Impacts would be less than significant and no mitigation required.

c. *No Impact* – The proposed Project is not anticipated to generate any new long-term jobs, nor attract new residents to the area, so the Project would not generate any new demand for the area schools. The Project area is served by several school districts including the following: Victorville Elementary School District, Victor Valley Union High School District, and the Adelanto Elementary School District. The State of California requires a portion of the cost of construction of public schools to be paid through a fee collected on residential, commercial, and industrial developments. The development impact fee mitigation program of the area School Districts adequately provides for mitigating the impacts of the proposed Project in accordance with current state law. VVWRA is exempt from payment of school fees as a public agency, but the proposed Project would not generate an increase in elementary, middle, or high school population. Therefore, the Project would have no impact relative to schools and no mitigation is required.

d. *No Impact* – The proposed Project will not add to the existing demand on local parks or recreational facilities. The proposed Project will not generate any new long-term jobs, nor attract new residents to the area. The Project would not generate any new direct demand for parks within the City since it would have no potential to induce substantial population growth within the City. The provision of parks within the City is provided through Park Development Impact Fees (DIF) on new residential and commercial development. Thus, the proposed Project will have no impact to parks and recreation facilities and no mitigation is required.

e. *No Impact* – Other public facilities include library and general municipal services. Since the Project will not directly induce substantial housing, population, or employment growth, it will not substantially increase the demand of other public facilities. Thus, the Project would have no impacts in this regard, and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a&b. *No Impact* – The proposed Project will not add to the existing demand on local or regional recreational facilities. The proposed Project will not build new homes, generate any new long-term jobs, or attract new residents to the area. The Project would not generate any new direct demand for parks within the City since it would have no potential to induce substantial population growth within the City. The provision of parks and recreational facilities within the City is provided through Park Development Impact Fees (DIF) on new residential and commercial development. The Project would not result in the development of any parks or recreational facilities, and further would not result in substantial physical deterioration of any parks or have any adverse physical effect on the environment in this regard. Thus, the proposed Project will have no impact to parks and recreation facilities and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the Project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous inter-sections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

SUBSTANTIATION: Due to the nature and limited extent of the Project, no traffic or transportation-related studies were conducted.

Impact Analysis

a *Less Than Significant Impact* – The proposed Project is located in the Ossum Wash on the north side of Turner Road in the City of Victorville. According to the City of Victorville General Plan 2030, Turner Road is a local collector road, which is a street that provides circulation within a defined geographic area and connects this area to intra-city traffic routes. Turner Road primarily serves as an access road for a few residences east of the airport and south of the Mojave River. It is not part of an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system or an applicable congestion management program.

The Project will generate temporary construction traffic of approximately 30 roundtrips per day which will be spread throughout the day during construction. These trips will not significantly impact the circulation within the area either on a temporary or permanent basis. Once the Project construction is complete, it will generate essentially no traffic since it consists of flood protection improvements and would not develop structures or occupied buildings. It is possible that limited maintenance after storm events may generate a few operational trips. Based on the limited number of additional trips accessing the Project site from Turner Road, the proposed Project will not have a significant effect on the local and regional circulation system and no mitigation is required.

The operation of the Ossum Wash Repair Project has no potential to impact alternative transportation plans, policies or programs. The Project operations over the long term will not generate any additional traffic and no new public roads or alterations to any existing public roads will result. The Project area is isolated and it is not served by alternative transportation. Additionally, few, if any, pedestrians or bicyclists utilize Turner Road and the Project itself does not include any activities that would pose hazards or barriers for pedestrian or bicycle use of this road. No potential exists to adversely impact any of the above alternative modes of transportation, as such, impacts under this issue are considered less than significant. No mitigation is required.

b. *No Impact* – The City of Victorville Vehicle Miles Traveled (VMT) Guidelines provides recommendations in the form of thresholds of significance and methodologies for identifying VMT related impacts. The City of Victorville has developed two types of screening criteria that can be applied to effectively screen projects from Project-level assessment: Step 1: Daily Vehicle Trip Thresholds and Step 2: Land Use Types Criteria. Per the City of Victorville VMT Guidelines, a Project that results in a net increase of 1,285 or less weekday daily trips per the latest edition of the Institute of Transportation Engineers (ITE) Trip General Manual may be presumed to have a less than significant impact on VMT. Further, the Land Use Types Criteria includes several land use types that the City has determined would generate minimal (less than significant) VMT. Increases in VMT from construction would be short-term, minimal, and temporary. The duration of the potential significant impacts would be limited to the period of time needed to construct individual projects. As such, VMT standards, which are intended to monitor and address long-term transportation impacts resulting from future development, do not apply to temporary impacts associated with construction activities. Therefore, no construction impact associated with VMT per CEQA Guidelines Section 15064.3 would occur.

The proposed Project would not cause substantial long-term/ongoing transportation effects, because proposed improvements, once constructed, would only require maintenance activities similar to those that occur under existing conditions and no increase in employees due to the implementation of the proposed Project is forecast to occur. Thus, the proposed Project would meet the provisions of Step 1: Daily Vehicle Trip Thresholds, by generating less than 1,285 or less weekday daily trips. Given that this Project will not contribute additional trips over the long term and will have minimal construction vehicle traffic over the short term, the proposed Project will have no potential to conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No mitigation is required.

c. *No Impact* – The proposed Project would not substantially increase hazards due to a design feature or incompatible uses. The proposed Project is located within Ossum Wash in Victorville, CA. Ossum Wash runs North-South, flowing northerly to its confluence with the Mojave River, approximately 850-feet north of Turner Road. Road runs East-West and the Project area is located north of where the wash crosses Turner Road. The installation of the proposed Ossum Wash Repair Project will require no work within nearby roadways beyond utilizing the roadways for site access during construction, and for any future maintenance trips associated with the Project operations. Due to its location and point of access, there will be no potential to substantially increase hazards due to a design feature or incompatible uses. This is especially true as, once the proposed improvements are installed, the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Thus, the proposed Project would have no potential to substantially increase hazards due to a design feature or incompatible uses. No impacts are anticipated and no mitigation is required.

d. *Less Than Significant Impact* – The Project will involve a maximum of 30 trips per day to and from the Ossum Wash to Turner Road to transport rip-rap for flood protection installation. Turner Road has very low peak hour vehicle trips as it mainly traverses through vacant, unoccupied land. Due to the low level of anticipated traffic, a construction traffic management plan is not required and no conflicts with traffic along Turner Road are anticipated. Thus, the proposed Project would have a

less than significant potential to result in inadequate emergency access and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the Project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographic-ally defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:				
a) 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	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in sub-division (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

SUBSTANTIATION: Please refer to the discussion under Section V, Cultural Resources.

The definition of a Tribal Cultural Resource can be described as follows:

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

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – The Project site is located within an area of tribal

resource significance. VVWRA has been contacted by one Tribe under Assembly Bill (AB) 52: the Yuhaaviatam of San Manuel Nation (YSMN). The tribe was were contacted to initiate the AB-52 process on April 20, 2026 to notify the tribe of the proposed Project through mailed letters. During the 30-day consultation period, the YSMN requested consultation on the Project. On June 8, Dr. Kristen Tuosto, a Tribal Representative, requested archaeological presence/absence testing be done first prior to Project implementation, to ensure there are no sensitive resources within the Project footprint. CRM TECH conducted the archaeological presence/absence testing and the results (no significant resources were identified) are detailed in a report that is provided as **Appendix 4** to this Initial Study. Throughout the course of the research procedures, no "historic properties" or "historical resources" were encountered in the APE. The only cultural resource found during the study was an isolated mano recovered approximately 180 centimeters below surface. It was recorded into the California Historical Resources Inventory under the temporary designation of Isolate 4390-1, pending assignment of a permanent identification number. Occurring out of an intact depositional context, however, the isolate does not constitute a potential "historic property"/"historical resource" and requires no further consideration under Section 106 or CEQA provisions. This information was provided to the Tribe, and their response was to request the implementation of several mitigation measures, including archaeological and tribal cultural monitoring, to ensure that no significant impacts to tribal cultural resources occur as a result of project implementation. Thus, the following mitigation measures shall be implemented to minimize potential impacts to tribal cultural resources to a level of less than significant:

TCR-1 Tribal Monitoring

Due to the heightened cultural sensitivity of the proposed project area, at the discretion of the consulting tribe(s), Tribal monitor(s) authorized to represent YSMN shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). At the discretion of the consulting tribes, a sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist, as detailed within CUL-1, and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN). Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR-2 Treatment of Cultural Resources During Project Implementation

If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.

The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by YSMN. All plans for analysis shall be reviewed and approved by the applicant and YSMN prior to implementation, and all removed material shall be temporarily curated on-site.

It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts.

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and YSMN for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and YSMN.

TCR-3 Inadvertent Discoveries of Human Remains
If human remains are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the

County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

No other Native American tribes have expressed interest in the proposed Project. Therefore, with implementation of **MMs TCR-1 through TCR-3**, as well as **MMs CUL-1 through CUL-4** above, the Project is not anticipated to cause a change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape, or object with 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. No further mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater 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?	☐	☒	☐	☐

SUBSTANTIATION

Impact Analysis

a. Water

No Impact – The proposed Ossum Wash Repair Project would not require connection to water service to operate. During construction, potable water from VVWRA's facility, which is currently served by two groundwater extraction wells serving VVWRA, is available to manage dust during construction. As such, given that VVWRA has available supply of potable water generated by onsite wells, it is anticipated that the proposed Project will not require or result in the relocation or construction of new or expanded water facilities. No impacts are anticipated under this issue.

Wastewater

No Impact – The proposed Ossum Wash Repair Project would not require connection to wastewater collection service to operate. Construction may require use of portable restrooms to accommodate construction workers for the duration of construction. The waste generated by this onsite

construction-related restroom use would be collected and processed by a licensed portable restroom provider. With no connection to municipal wastewater required to construct and operate the Project, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded wastewater facilities. No impacts are anticipated and no mitigation is required.

Stormwater

Less Than Significant Impact – Please refer to the discussion under Section X, Hydrology and Water Quality, of this Initial Study. The purpose of the proposed Project is to mitigate the risk of pipe exposure and damage within Ossum Wash through installation of various types of riprap within the channel. A hydraulic analysis (**Appendix 1**) was performed to determine the appropriate riprap size and placement within the Wash to ensure that the riprap does not adversely alter the existing drainage pattern of the Wash. Through the implementation of the Project as designed in compliance with the hydraulic analysis, the Project will not change the overall drainage pattern on the site or affect any downstream water courses. Surface water will be adequately managed through Project design and as such, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power

No Impact – Electrical power to the area is provided by Southern California Edison (SCE), however, the proposed Project will not utilize electricity, as no connections are required to enable the Ossum Wash to continue operating once the improvements are installed. Therefore, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded electrical power facilities. No impacts are anticipated and no mitigation is required.

Natural Gas

No Impact – Development of the Ossum Wash Repair Project would not demand natural gas. Therefore, the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. No impacts are anticipated.

Telecommunications

No Impact – Development of the Ossum Wash Repair Project would not demand telecommunication services. Therefore, the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunication services. No impacts are anticipated.

b. *Less Than Significant Impact* – Please refer to the discussion under Hydrology, Section X(b) above. The installation of the riprap associated with the proposed Project improvements would require small quantities of water to control fugitive dust and this can be provided from recycled water sources or at the nearest potable water outlets. In the short term, if any potable water must be used it will be such a small quantity (about 5,000 gallons per day of construction/grading) that no significant effect on the Upper Mojave River Valley Groundwater Basin, nor the specific supply accessed by VVWRA's water wells, will occur. as the Project does not propose to extract groundwater from the underlying groundwater basin beyond that which is presently extracted by VVWRA's

potable water wells to serve potable water needs of their operations, it is not anticipated that the Project would impede VVWRA's ability to maintain sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, the impact of implementing the proposed Project on water supplies would be less than significant, specifically because the Project would demand only minimal temporary supply during construction, and no water supply during operation. No mitigation is required.

c. *No Impact* – The proposed Ossum Wash Repair Project would not require connection to wastewater collection service to operate. Construction may require use of portable restrooms to accommodate construction workers for the duration of construction. The waste generated by this onsite construction-related restroom use would be collected and processed by a licensed portable restroom provider. With no connection to municipal wastewater required to construct and operate the Project, development of the Project would have no potential to 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. No impacts are anticipated and no mitigation is required.

d&e. *No Impact* – The proposed Project will not generate any demand for solid waste service system capacity as it will not have any occupied buildings or permanent onsite employees that would generate solid waste during operation. During construction, there is a limited potential for waste to be generated by the construction workers for the 4-6 week period in which the project is constructed. The amount of waste generated per day is anticipated to be less than 10 pounds per day, which would fall within the existing daily capacities of area landfills. For instance, the Victorville Sanitary Landfill has a maximum daily permitted capacity of 3,000 tons, with about 14,000,000 tons of capacity remaining available.[12] Even with the City's mandatory source reduction and recycling program, the proposed Project is not forecast to cause any significant adverse impact to the City's solid waste disposal system. Because the Project will not generate any solid waste, there would be no potential for the project to conflict with solid waste regulations under Federal, State, and local statutes. Furthermore, as the project would not generate any solid waste, it would not contribute to the landfill capacities, and therefore, area landfill(s) would continue to have sufficient permitted capacity to accommodate the area's solid waste disposal needs. No impacts are anticipated under these issues and no mitigation is necessary.

[12] CalRecycle, 2024. Victorville Sanitary Landfill. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652 (accessed 07/18/26)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of 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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a-d. *No Impact* – The proposed Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone, therefore it will have no impacts to any wildfire issues. The proposed improvements would be constructed primarily within the existing Ossum Wash, as previously described. CAL FIRE designates most of the areas within the Project area as being located outside of FHSZ, and is located within a LRA due to the Project's location within the City of Victorville, outside of higher fire risk areas in the San Bernardino Mountains (**Figure IX-5**). Additionally, the Project is in a rural area and is not adjacent to any urbanized areas or residences. There are no habitable structures proposed by the Project. The Project site is a desert wash located within a rural open space area with few improved uses. The area is far removed from the high fire hazard areas that are located adjacent to the San Bernardino Mountains to the south.

The operation of the Ossum Wash would not be constructed of flammable materials or involve any spark-producing activities, as the Wash would continue to function as it does at present, but with enhanced protections for the two belowground sewer lines traversing the Wash. Thus, operation of the proposed Project would have a no potential to result in any wildfire related impacts. As such, no impacts under these issues are anticipated and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	☐	☒	☐	☐
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

SUBSTANTIATION

The analysis in this Initial Study and the findings reached indicate that the proposed Project can be implemented without causing any new Project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control potential environmental impacts of the proposed Project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

a. *Less Than Significant With Mitigation Incorporated* – The Project has no potential to cause a significant impact any biological or cultural resources. The Project has been identified as having no potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project requires mitigation to prevent significant impacts on biological resources from occurring as a result of implementation of the Project. These measures include mitigation to protect nesting birds, burrowing owl, desert tortoise, minimize impacts to jurisdictional features, and implement a WEAP. Mitigation to address the adjacent sensitive cultural resources is required, but will ensure that these sensitive resources are protected and will not be impacted by the proposed Project. Additionally, because it is not known what could be unearthed upon any excavation activities, mitigation measures are provided to ensure that, in the event that any resources are found, they are protected from any potential impacts. These measures include

tribal and archaeological monitoring and testing procedures. Please see biological, cultural, and tribal cultural resource sections of this Initial Study.

b. *Less Than Significant With Mitigation Incorporated* – The Project has 8 potential impact categories that are individually limited, but may be cumulatively considerable. These are: Aesthetics, Biological Resources, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, and Tribal Cultural Resources. The Project is not considered growth-inducing, as defined by *State CEQA Guidelines*, particularly because the Project will repair Ossum Wash, but will not alter the volume of water that it can accommodate. The above issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed Project have been determined to be less than considerable and thus, less than significant impacts.

c. *Less Than Significant With Mitigation Incorporated* – The proposed Project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Geology & Soils, Hazards & Hazardous Materials, and Noise require the implementation of mitigation measures to reduce human impacts to a less than significant level. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed Project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the latest Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Agriculture, Air Quality, Energy, Greenhouse Gases, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. The issues of Aesthetics, Biological Resources, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, and Tribal Cultural Resources, require the implementation of mitigation measures to reduce Project specific and cumulative impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact level.

Based on the findings in this Initial Study, Victor Valley Wastewater Reclamation Authority (VVWRA) proposes to adopt a Mitigated Negative Declaration (MND) for the Ossum Wash Repair Project. A Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) will be issued for this project by VVWRA. The Initial Study and NOI will be circulated for 30 days of public comment because this project involves the state as either a responsible or trustee agency. At the end of the 30-day review period, a final MND package will be prepared and it will be reviewed by the VVWRA for a possible adoption at a future VVWRA hearing, the date for which has not yet been determined. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*,(1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; San *Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2019
Authority: Public Resources Code sections 21083 and 21083.09
Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

Aesthetics

AES-1 The Project shall implement at least the following measures, unless they conflict with the local jurisdiction's light requirements, in which case the local jurisdiction's requirements shall be enforced:

- Use of low-pressure sodium lights where security needs require such lighting to minimize impacts of glare.
- The height of lighting fixtures shall be lowered to the lowest level consistent with the purpose of the lighting to reduce unwanted illumination.
- Directing light and shielding shall be used to minimize off-site illumination during both construction of the Project.
- No light shall be allowed to intrude into sensitive light receptor areas during both construction of the Project.
- Non-reflective materials and/or coatings shall be used on the exterior of all facilities if constructed in a publicly visible location (such as from a roadway or public facility).

Biological Resources

BIO-1 A qualified biologist shall develop a Worker Environmental Awareness Program (WEAP) that shall include information on general and special status species, including but not limited to burrowing owl (Athene cunicularia) and desert tortoise (Gohperus agassizii) within the project area, identification of these species and their habitats, current conservation_status, techniques and mitigation measures that shall be being implemented during construction to avoid impacts to species, consequences of killing or injuring an individual of a listed species, and reporting procedures when encountering listed or sensitive species.

Construction crews, foremen, and other personnel potentially working on site will attend this education program and place their name on a sign-in sheet. This briefing shall include provisions of any requirements required for the project. The contractor shall implement WEAP training on the first day of work and periodically throughout construction as needed.

BIO-2 Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys shall be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW prior to commencing Project activities.

BIO-3 Preconstruction surveys for Desert Tortoise shall be conducted no more than 48 hours prior to initiation of Project activities and after any pause in Project activities lasting 30 days or more. Desert tortoise pre-construction surveys shall be conducted in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology; if the biologist detects a desert

tortoise, the biologist or applicant will contact the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife immediately. If the survey confirms presence of desert tortoise, the biologist will make a determination regarding tortoise mitigation: (1) if desert tortoise fencing needs to be installed around the perimeter of the construction work zone; or (2) if no further action is required. The biologist/monitor should remain on-call during construction activities to respond to a circumstance where a desert tortoise wanders into the construction area. If complete avoidance cannot be achieved, VVWRA shall obtain an Incidental Take Permit (ITP) first from the USFWS and also a CESA ITP from the CDFW under Fish and Game Code section 2081.

BIO-4 A qualified biological monitor shall be present during all project activities to ensure no *burrowing owl (Athene cunicularia), desert tortoise (Gopherus agassizii*), or other sensitive species wander onto the site and to ensure no impacts will result to sensitive species during Project installation.

BIO-5 California Department of Fish and Wildlife (CDFW) shall be notified pursuant to Fish and Game Code section 1602. If CDFW determines that the Project may substantially affect fish and wildlife resources, then CDFW shall issue a Streambed Alternation Agreement (Agreement). The Agreement shall include measures to avoid, minimize, and mitigate impacts to Fish and Game Code section 1602 resources.

Through an Agreement from CDFW and/or other agencies (USACE, RWQCB [regulatory agencies]) with jurisdiction over impacts to jurisdictional waters, VVWRA shall minimize discharge of fill to the extent feasible, and any discharge of fill not avoidable and all impacts to Fish and Game Code section 1602 resources shall be authorized and mitigated through compensatory mitigation in an Agreement. Mitigation shall be provided by restoration of temporary impacts, enhancement of existing resources, or for permanent impacts as follows: purchasing into CDFW, Corps, or RWQCB authorized mitigation bank; or by selecting a site near the Project site and enhancing it with a native riparian habitat or invasive species removal in accordance with a habitat mitigation plan approved by regulatory agencies; or by acquiring sufficient compensating habitat to meet regulatory agency requirements. Impacts to jurisdictional waters shall be mitigated at a minimum 1:1 ratio, with the ultimate compensatory mitigation ratio being determined through negotiation with regulatory agency, and never at a rate of less than 1:1. The ratio will rise based on the type of habitat, habitat quality, and presence of sensitive or listed plants or animals in the affected area. This ratio will be determined by the regulatory agency, and must be deemed sufficient by the regulatory agency issuing the permit to compensate for/offset the impacts to the jurisdictional waters and supported species and habitats therein. A Habitat Mitigation and Monitoring Proposal shall be prepared by a biologist or regulatory specialist and reviewed and approved by the appropriate regulatory agencies. These agencies (USACE, RWQCB, CDFW and any other applicable regulatory agency with jurisdiction over the proposed Project) can impose greater mitigation requirements in their permits, but VVWRA will utilize the ratios outlined above as the minimum required to offset or compensate for impacts to jurisdictional waters, riparian areas or other wetlands.

BIO-6 Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the project areas

(including access routes) and a 500-foot buffer surrounding the project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Cultural Resources

CUL-1 Should any cultural resources be encountered during construction, any earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with VVWRA's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures to be implemented within the guidelines of the California Environmental Quality Act to reduce impacts to discovered resources to a less than significant level.

CUL-2 Monitoring and Treatment Plan
A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CUL-3 Archaeological Monitoring
Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.],

and archaeological work). A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

CUL-4 Worker Environmental Awareness Program
Prior to project initiation, a qualified archaeologist should be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training should be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Tribal representatives from the Consulting Tribes, such as Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians) will be allowed to attend and/or participate in the WEAP training should they elect to and will be given ten days' notice prior to the training. Archaeological sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

Geology and Soils

GEO-1 For each site-specific Project that is less than one acre in size requiring ground disturbing activities such as grading, VVWRA shall identify and implement BMPs to minimize soil erosion and loss of topsoil comparable to that which would be required under a SWPPP (BMPs may include, but are not limited to hay bales, wattles, detention basins, silt fences, coir rolls, etc.) to ensure that the discharge of the storm runoff from the construction site does not cause erosion downstream of the discharge point. If any substantial erosion or sedimentation occurs as a result of discharging storm water from a Project construction site, any erosion or sedimentation damage shall be restored to pre-discharge conditions.

Hazards and Hazardous Materials

HAZ-1 All accidental spills or discharge of hazardous material during construction activities shall be reported to the local Certified Unified Program Agencies (CUPA) and shall be remediated in compliance with applicable Federal, State, and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste shall be collected and disposed of at a licensed disposal or treatment facility. This measure shall be incorporated into SWPPP prepared for each future facility developed under the Project, or where an SWPPP is not required due Project size, shall be incorporated as a BMP. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

Hydrology and Water Quality

HYD-1 Prior to the commencement of construction of the Project, VVWRA shall require implementation of and construction contractor(s) shall select best management practices (BMPs) to achieve a reduction in pollutants from stormwater discharge to the maximum extent practicable during

construction, and to control urban runoff after the Project is in operation. Examples of BMP(s) that would achieve a reduction in pollutants include, but are not limited to:

- The use of silt fences or coir rolls;
- The use of temporary stormwater desilting or retention basins;
- The use of water bars to reduce the velocity of stormwater runoff;
- The use of wheel washers on construction equipment leaving the site;
- The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;
- The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and
- Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.

Noise

NOI-1 VVWRA shall require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.

NOI-2 Equipment not in use for five minutes shall be shut off.

NOI-3 Equipment shall be maintained and operated such that loads are secured from rattling or banging.

NOI-4 Where commercially available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.

NOI-5 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment. This measure shall be included in the construction contract as a contract specification by the contractor.

NOI-6 No radios or other sound equipment shall be used at this site unless required for emergency response by the contractor.

NOI-7 Construction shall be limited to the hours of 7 AM and 6 PM Monday through Friday, 8 AM and 5 PM Saturday, and shall not be allowed on Sundays or any Federal Holiday unless an emergency warrants the continuation of construction outside of the aforementioned hours.

Tribal Cultural Resources

TCR-1 Tribal Monitoring
Due to the heightened cultural sensitivity of the proposed project area, at the discretion of the consulting tribe(s), Tribal monitor(s) authorized to represent YSMN shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is

not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). At the discretion of the consulting tribes, a sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist, as detailed within CUL-1, and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN). Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR-2 Treatment of Cultural Resources During Project Implementation

If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.

The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by YSMN. All plans for analysis shall be reviewed and approved by the applicant and YSMN prior to implementation, and all removed material shall be temporarily curated on-site.

It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts.

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the

proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and YSMN for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and YSMN.

TCR-3 Inadvertent Discoveries of Human Remains

If human remains are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

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APPENDIX 1