PUBLIC REVIEW DRAFT • MAY 2021

Southern California Logistics Airport (SCLA) Lot 44 Distribution Center Project

Initial Study/Mitigated Negative Declaration

Prepared For:

City of Victorville

Prepared by

Michael Baker INTERNATIONAL

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Southern California Logistics Airport (SCLA) Lot 44 Distribution Center Project

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1.0 INTRODUCTION

The Southern California Logistics Airport (SCLA) Lot 44 Warehouse Project (herein referenced as the "project") is located within the northwestern portion of the City of Victorville, immediately west of SCLA. The project site is located within the western portion of the of the SCLA Specific Plan, on a 72.2-acre property. The project proposes the construction of a 1,080,308 square-foot warehousing/distribution facility with associated parking, landscaping, utility, and roadway improvements; refer to Section 2.0, *Project Description*. Following a preliminary review of the proposed project, the City has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study/Mitigated Negative Declaration addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with CEQA (Public Resources Code Section 21000-21177) and pursuant to California Code of Regulations Section 15063, the City of Victorville, acting in the capacity of Lead Agency under CEQA, is required to undertake the preparation of an Initial Study to determine if the proposed project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Public Resources Code Section 21080(c)).

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and/or other discretionary approvals would be required.

The environmental documentation is subject to a public review period. During this review, public agency comments on the document relative to environmental issues should be addressed to the City. Following review of any comments received, the City will consider these comments as a part of the project's environmental review and include them with the Initial Study documentation for consideration by the City.

1.2 PURPOSE

Section 15063(d) of the CEQA Guidelines identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

Section 15071 of the CEQA Guidelines identifies the required contents for a negative declaration/mitigated negative declaration, which include the following:

a) A brief description of the project, including a commonly used name for the project, if any;
b) The location of the project, preferably shown on a map, and the name of the project proponent;
c) A proposed finding that the project will not have a significant effect on the environment;
d) An attached copy of the Initial Study documenting reasons to support the finding; and
e) Mitigation measures, if any, included in the project to avoid potentially significant effects.

1.3 CONSULTATION

As soon as a Lead Agency (in this case, the City of Victorville) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project, to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these, and other governmental agencies as required under CEQA and its implementing guidelines.

1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. These documents are available for review at the City of Victorville Development Department, located at 14343 Civic Dr, Victorville, California 92392.

- *City of Victorville General Plan 2030 (October 21, 2008).* The Victorville City Council adopted the *City of Victorville General Plan 2030* (Victorville General Plan) on October 21, 2008. The Victorville General Plan provides a general, comprehensive, and long-range guide for community decision-making. The Victorville General Plan covers the seven State-mandated elements. Each element contains a brief introduction, several goals and related policies, and a description of implementation programs to accomplish said goals and related policies. Specifically, the Victorville General Plan contains the following elements:

  - Land Use Element;
  - Circulation Element;
  - Housing Element;
  - Noise Element;
  - Safety Element;
  - Resource Element (incorporates Open Space and Conservation);

- *Final Program Environmental Impact Report for the City of Victorville General Plan 2030 (2008)*. The Final Program Environmental Impact Report for the City of Victorville General Plan 2030 (Victorville General Plan FPEIR) was certified by City Council in 2008. The Victorville General Plan FPEIR analyzes the environmental impacts associated with adoption and implementation of the Victorville General Plan. The General Plan FPEIR was prepared as a Program EIR, which is intended to facilitate consideration of broad policy directions, program-level alternatives, and mitigation measures consistent with the level of detail available for the plan. The General Plan FPEIR concluded significant and unavoidable impacts related to air quality, population and housing, noise, traffic, and growth inducement.

- *Victorville, California Municipal Code (codified through Ordinance No. 2404, passed December 17, 2019).* The Victorville, California Municipal Code (Victorville Municipal Code) consists of all the regulatory and penal ordinances and administrative ordinances of the City of Victorville. The Municipal Code is the primary method

the City uses to control land uses, in accordance with General Plan goals and policies. The City's Development Code, adopted as Victorville Municipal Code Title 16, is intended to implement the Victorville General Plan and regulate development in order to protect and promote the public health, safety, prosperity and general welfare. The City's Building and Fire Regulations, adopted as Victorville Municipal Code Title 16, Chapter 5, specify rules and regulations for construction, alteration, and building of structures for human occupancy.

- *Southern California Logistics Airport Specific Plan (1993, as amended).* The Southern California Logistics Airport Specific Plan (SCLA Specific Plan) is a comprehensive set of plans, regulations, criteria, conditions, and programs for guiding the orderly development of SCLA. The Victorville City Council approved the original Specific Plan on February 2, 1993 and it became legally effective on March 5, 1993. The City of Victorville has approved several amendments to the Specific Plan, with the most recent major amendment in February 2004, which added approximately 2,800 acres to the Specific Plan area. The City is currently processing a comprehensive amendment to the Specific Plan that is intended to modernize the SCLA Specific Plan to reflect current development trends, economic and market conditions, infrastructure requirements, and design guidelines and also enhance the format and framework of the Specific Plan to more efficiently guide development at SCLA.

- *Environmental Impact Report: George Air Force Base General Plan, Prezoning, and Specific Plan (1992).* This EIR discusses the potential environmental impacts associated with the initial implementation of the Southern California Logistics Airport Specific Plan, upon closure of the former George Air Force Base and deactivation in 1992. To provide the context in which potential environmental impacts may occur, discussions of potential changes to the local communities, including population and employment, land use and aesthetics, transportation, and community and public utility services are included in this EIR. In addition, issues related to current and future management of hazardous materials and wastes are discussed. Impacts to the physical and natural environmental are evaluated for geology and soils, water resources, air quality, noise, biological resources, and cultural resources. The EIR identified a significant unavoidable impact related to water resources.

- *Comprehensive Land Use Plan, Southern California Logistics Airport (September 2008).* The SCLA Comprehensive Land Use Plan (CLUP) is intended to protect and promote the safety and welfare of airport users, residents, and visitors to the cities of Victorville and Adelanto, while promoting the continued operation of the airport. The plan includes land use controls and policies to protect the public from aircraft noise, ensure people and facilities are not concentrated in areas susceptible to aircraft crashes, and ensure no structures or activities encroach upon or adversely affect the use of navigable airspace. The CLUP was drafted for in 2008; however, this document was not officially adopted by the City. Thus, the CLUP is not a regulatory document, but generally contains information that can be used to inform land use decisions for the purposes of the SCLA Specific Plan.

- *Southern California Logistics Airport Specific Plan Amendment and Rail Service Project Draft Subsequent Program Environmental Impact Report (January 2004).* The Southern California Logistics Airport Specific Plan Amendment and Rail Service Project Draft Subsequent Program Environmental Impact Report (2004 SCLA SPEIR) reviewed the existing conditions, potential environmental impacts, and feasible mitigation measures to reduce the potentially significant effects of the proposed SCLA Specific Plan Amendment and Rail Service Project. The SCLA Specific Plan Amendment and Rail Service Project encompassed a total 3,373 acres as part of the Specific Plan Amendment and 171 acres for related off-site improvements, and consists of all actions associated with entitlement, financing, construction, phasing and operation related to the implementation of: 1) conversion of 540 acres within the existing SCLA Specific Plan from a zoning designation of Business Park to Industrial; 2) the 2,833-acre expansion of the existing SCLA Specific Plan area for inclusion of a major intermodal/multimodal rail cargo facility; 3) 44-acre Study Area for the off-site realignment of Turner/Shay Roadway, and 4) 127 acres of off-site rail improvements including a 114-acre Study Area for the proposed Lead Track (ultimate alignment would be approximately eight acres) and a 13-

acre study area for Siding Tracks to be located primarily within the existing Burlington Northern Santa Fe (BNSF) right-of-way (nine acres within existing right-of-way, four acres of additional right-of-way required along the western side of existing right-of-way). The 2004 SCLA SPEIR identified significant and unavoidable impacts related to aesthetics/light and glare, air quality, biological resources, land use and relevant planning, noise, growth inducement, and cumulative impacts.

- *Southern California Logistics Airport (SCLA) Specific Plan Amendment Subsequent Program Final Environmental Impact Report (February 2021),* SCH No. 2003011008. This EIR was prepared as part of the comprehensive SCLA Specific Plan Amendment, described above, that is currently being processed by the City. As noted above, the SCLA Specific Plan became effective in 1993; the only major amendment to the Specific Plan occurred in 2004. Many of the foundational elements of the Specific Plan are now over 25 years old. Thus, the City, in partnership with Stirling Development, proposes to amend the Specific Plan to: 1) decrease the development footprint of the existing SCLA Specific Plan area, including removal of over 1,000 acres for industrial development; 2) reflect current development trends, economic and market conditions, and design guidelines; 3) provide an updated description of existing infrastructure serving SCLA, and projected requirements to serve future development; and 4) modernize the format and framework of the Specific Plan to more efficiently guide development at SCLA. The SCLA Specific Plan Amendment Final Subsequent Program Environmental Impact Report reviews the existing conditions, analyzes potential environmental impacts, and identifies feasible mitigation measures to avoid or lessen the potentially significant effects resulting from implementing the SCLA Specific Plan, as amended.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of Victorville (City) is located in the southwestern portion of San Bernardino County, in the geographic sub-region of the southwestern Mojave Desert (known as Victor Valley, or the High Desert) refer to Exhibit 2-1, *Regional Map*. On a regional basis, the City and its' sphere of influence (SOI) are accessible via Interstate 15 (I-15), U.S. Highway 395 (US-395), State Route 18 (SR-18), and Historic Route 66 (National Trails Highway). Cities surrounding the City of Victorville include the City of Adelanto to the northwest, Town of Apple Valley to the east, City of Hesperia to the south, and unincorporated San Bernardino County to the southwest and north.

The Southern California Logistics Airport (SCLA) Lot 44 project site is specifically located in the northwestern portion of the City, within the western portion of the SCLA Specific Plan. It is situated immediately west of the SCLA, east of Adelanto Road, and approximately 0.5-mile north of Innovation Way; refer to Exhibit 2-2, *Site Vicinity*.

2.2 ENVIRONMENTAL SETTING

The project site is situated in a geographic sub-region of the southwestern Mojave Desert known as Victor Valley. The region is commonly referred to as the "High Desert" due to its approximate elevation of 2,900 feet above sea level. The Mojave Desert is bounded to the west by the Tehachapi Mountains and to the south by the San Gabriel and San Bernardino Mountains. The project site and surrounding area are relatively flat.

The SCLA exists to the east and beyond the airport is the Mojave River, flowing to the north. The principal Mojave River drainage basin covers an approximate area of over 3,000 square miles in the south-central portion of the Mojave Desert. The river channel is approximately 125 miles long and has a gradient of about 15 feet per mile. Watersheds in the mountain ranges south of the project site comprise the majority of the Mojave River's flow. Infrequent rains with heavy precipitation are the principal source of surface water and are responsible for the formation of gullies and drainage tributaries to the Mojave River.

Hot summers, cool winters, low humidity, infrequent precipitation, and generally clear skies characterize the climate of the Victor Valley area. Daily mean temperatures range from approximately 46 degrees Fahrenheit in the winter to 79 degrees Fahrenheit in the summer. Rainfall is typically less than 10 inches per year, and humidity rarely exceeds 50 percent.

The project site is composed of two primary components: 1) an approximately 72.2-acre property on SCLA Lot 44 where the proposed distribution center would be constructed; and 2) approximately 26.4 acres to the south and southwest that would accommodate ancillary utility and roadway improvements.

The 72.2-acre project site is fenced and is generally vacant and undeveloped, and has been previously disturbed as part of former military activities when the site was part of the former George Air Force Base. Most recently, the site has been utilized for surplus passenger automobile storage. The site is generally flat, with a gentle downward slope towards the north. The site has been subject to routine disking, tilling, and weed abatement and is void of any natural vegetation communities; vegetation that does exist includes ruderal/weedy, low-growing plant species. The site is void of any improved structures, with the exception of an approximately 3,000 square-foot roofed concrete structure. It is a reinforced concrete and timber structure with timber cladding and an open bay filled with an earthen mound. The earthen mound was intended to contain live ammunition fire from military aircraft, during operation of the former George Air Force Base.

SOUTHERN CALIFORNIA LOGISTICS AIRPORT (SCLA) LOT 44 DISTRIBUTION CENTER PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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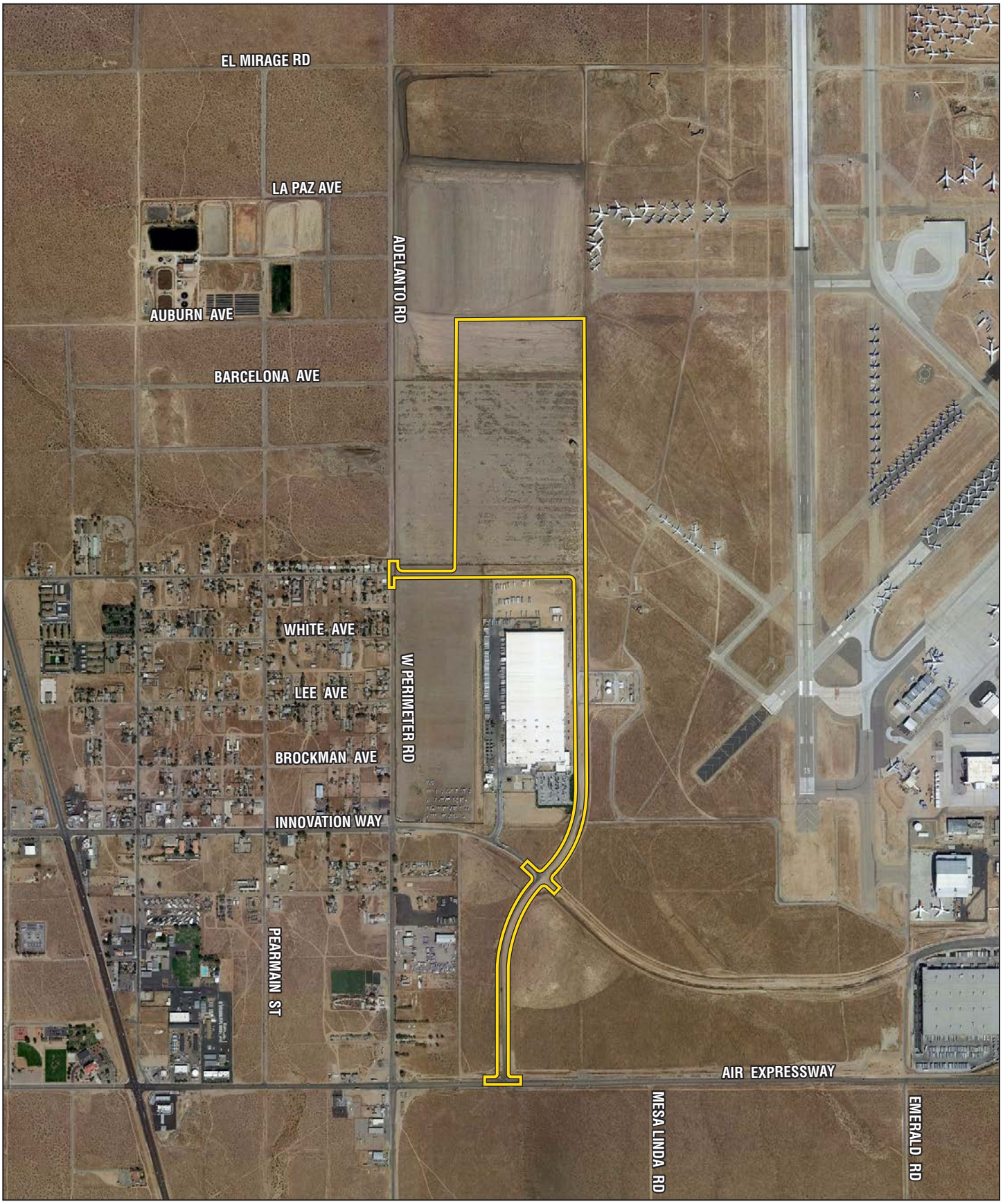
Regional Map

Exhibit 2-1



Source: Google Earth Pro, April 2021

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Project Site

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Site Vicinity

Exhibit 2-2

As noted above, areas to the south and southwest of the distribution center site would accommodate roadway and utility improvements, as follows:

- **Gateway Drive:** The project site includes a corridor along existing Gateway Drive, from Air Expressway to its current terminus immediately east of an existing warehouse use (occupied by Dr. Pepper/Snapple), and then proceeding north to the distribution center site. This corridor includes paved areas along existing Gateway Drive, and vacant/disturbed areas of open land between the existing northerly terminus of Gateway Drive and the distribution center site. This corridor would allow for the northerly extension of Gateway Drive to the distribution center site, in addition to required utility connections.

- **Momentum Road:** The project also includes a corridor extending from the southwestern corner of the distribution center site to Adelanto Road. This corridor is occupied by vacant/disturbed areas of open land, and would allow for construction of Momentum Road between Gateway Drive and Adelanto Road along the southern boundary of the distribution center site, in addition to required utility connections.

SURROUNDING USES

Surrounding land uses in proximity to the project site are primarily comprised of airport, industrial, residential, and vacant land. The surrounding land uses are as follows; refer to Table 2-1, *Surrounding Uses*:

- *North:* The site is bound by disturbed, vacant land to the north.

- *East:* SCLA runways and airport support facilities are situated to the east.

- *South:* Industrial uses are located south of the project site (Dr. Pepper/Snapple facility).

- *West:* The project site is bounded to the west by vacant/disturbed land and Adelanto Road. Further west of Adelanto Road, within the City of Adelanto, are a mix of single-family residential and industrial uses.

2.3 EXISTING GENERAL PLAN AND ZONING

Based on the *City of Victorville General Plan Land Use Policy and Zoning Map* (Victorville Land Use and Zoning Map), dated August 19, 2013, the project site is designated/zoned Specific Plan. The SCLA Specific Plan designates the project site as Industrial (I). The Industrial designation is intended for development of a broad range of industrial activities, including larger scale industrial. A range of permitted uses include distribution centers, processing facilities, heavy/light manufacturing, and warehousing, among others. Surrounding uses including land use designations and zoning are shown in Table 2-1, below.

Table 2-1
Surrounding Uses

Direction from Site	Jurisdiction	Land Use Designation	Zoning	Specific Plan Land Use Designation
North	City of Victorville	Specific Plan (SP1-92)	Specific Plan (SP1-92)	Industrial (I)
East	City of Victorville	Specific Plan (SP1-92)	Specific Plan (SP1-92)	Airport and Support Facilities (ASF)
South	City of Victorville	Specific Plan (SP1-92)	Specific Plan (SP1-92)	Industrial (I)
West	City of Adelanto	Desert Living (DL-9) (1 du/9 ac), Airport Development District (ADD), and Business Park (BP)	Desert Living (DL-9) (1 du/9 ac), Airport Development District (ADD) and Business Park (BP)	N/A

2.4 PROJECT CHARACTERISTICS

The proposed project would include construction of a distribution center on approximately 72.2 acres of the SCLA Lot 44 site. The new distribution center would consist of a 1,080,308 square-foot building footprint, which includes 36,241 square feet of office space. The facility would also feature a 250,028 square-foot mezzanine, 98 truck loading docks, 396 trailer parking stalls, and 1,010 passenger vehicle parking spaces; refer to Exhibits 2-3, *Conceptual Site Plan*. The project proposes to enhance the local economy and municipal revenue, and furnish local employment opportunities for residents, consistent with the goals of the City's General Plan.

To provide access to the project site, Gateway Drive would be extended from its existing northerly terminus (adjacent to the Dr. Pepper/Snapple facility) to the northerly boundary of the distribution center site. In addition, a new east-west roadway, Momentum Road, would connect the new Gateway Drive extension to the east with Adelanto Road to the west. Momentum Road would be constructed along the southerly boundary of the distribution center site. Additional ancillary improvements such as landscaping and utility work would also be required.

Primary components of the proposed project are discussed in further detail below.

PROPOSED WAREHOUSING/DISTRIBUTION BUILDING

As noted above, the new distribution center would consist of a 1,080,308 square-foot building footprint, which includes 36,241 square feet of office space. The facility would also feature a 250,028 square-foot mezzanine. This facility would occupy the majority of the project site. The distribution building would have a maximum height of 52 feet and four inches; refer to Exhibit 2-4, *Distribution Center Elevations*. The distribution building would be constructed with concrete wall panels and painted with variations of grey and a blue accent color. The building would include an aluminum window system, aluminum storefront entrance doors, and a steel frame entry canopy with prefinished composite aluminum panel fascia and ceiling system. Billboard signage is proposed along the eastern facing side of the building and two monument signs are proposed between the eastern parking lot and the extension of Gateway Drive. This distribution center would also include a total of 98 truck loading docks on the northern and western sides of the building.

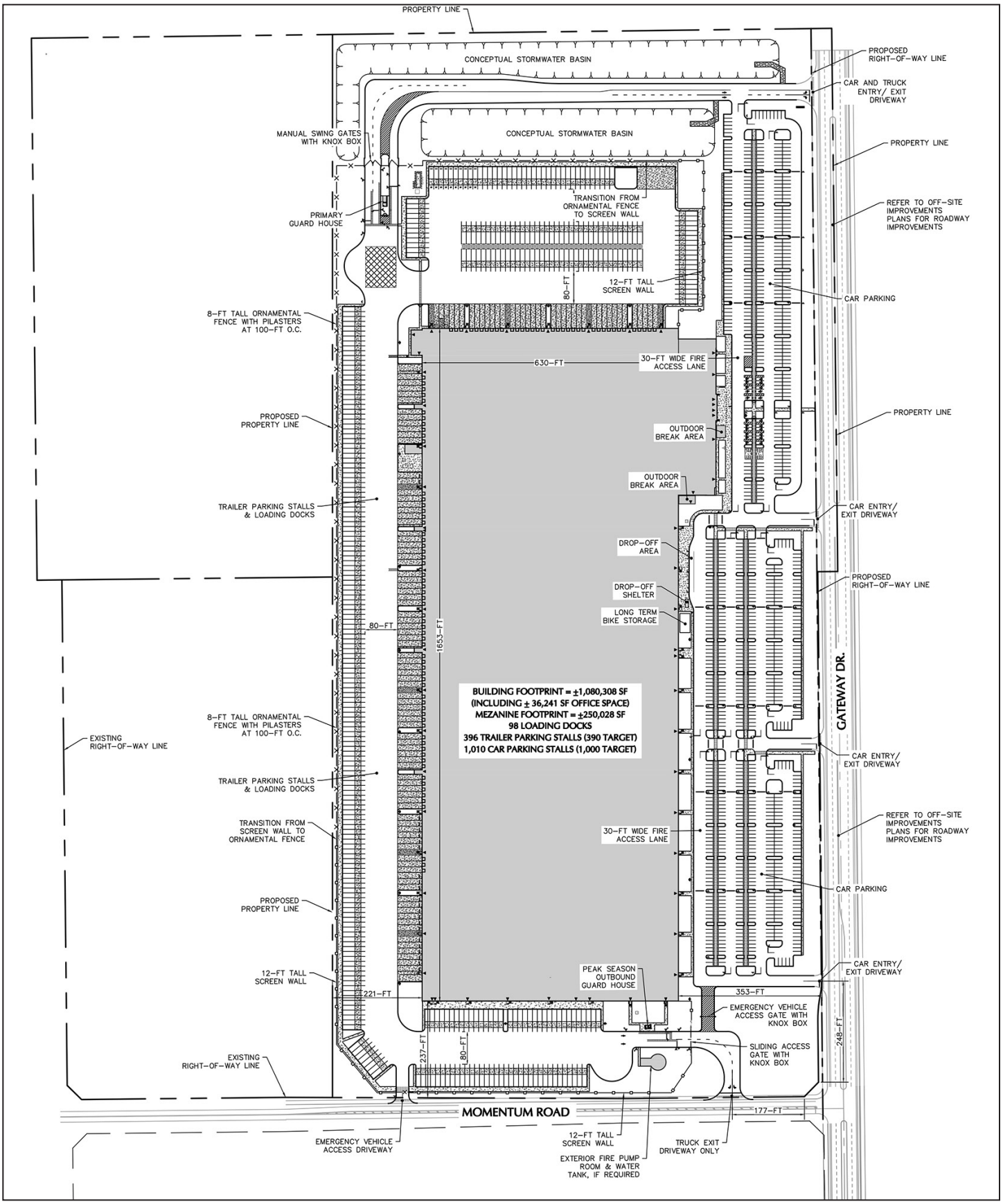
PROPOSED WAREHOUSING/DISTRIBUTION OPERATIONS

The proposed distribution center is intended to function as a fulfillment center, operating 24 hours a day, seven days a week, and employing approximately 850 people. The facility would receive products from vendors and other warehouses. Products would be stored in different storage types (mainly traditional pallet racking systems and shelving), providing the capability to fulfill customer orders and sort them to downstream transportation connections. Cages and pallets coming from inbound operations are sent towards drop zones with Powered Industrial Trucks (PIT) to perform the stowing process onto the storage system (e.g. very narrow aisle (VNA) pallet racks, shelving, etc.). Orders would be packed into cages and brought over to their respective process paths: single pack, multi pack, trans-out, vendor returns, and giftwrap. Packing is performed at workstations and directed towards the outbound sortation area via automated sorters, where packages are placed on pallets designated for various logistics carriers.

ROADWAY IMPROVEMENTS

Areas to the south and southwest of the distribution center site would accommodate roadway improvements, as follows:

Gateway Drive: The project site includes a corridor along existing Gateway Drive, from Air Expressway to its current terminus immediately east of an existing warehouse use (occupied by Dr. Pepper/Snapple), and then proceeding north to the distribution center site. Gateway Drive would generally be improved from a two-lane roadway to a four-lane major arterial with raised concrete median. Shared bike lanes, sidewalk, and curb and gutter would be installed on both the northbound and southbound sides of the roadway. A two-way stop-controlled intersection is proposed at the Innovation Way and Gateway Drive intersection. This corridor would allow for the northerly extension of Gateway Drive to the distribution center site, in addition to required utility connections, which are described below.



Source: Langan Engineering and Environmental Services, Inc., April 2021

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SOUTHERN CALIFORNIA LOGISTICS AIRPORT (SCLA)
LOT 44 DISTRIBUTION CENTER PROJECT
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Conceptual Site Plan

Exhibit 2-3

Source: HPA Architects, April 2021

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Distribution Center Elevations

Exhibit 2-4

Momentum Road: South of the distribution center, the project includes a new corridor extending from the southwestern corner of the distribution center site to Adelanto Road. Momentum Road would be a two-lane east-west roadway with a shared bike lane, sidewalk, and curb and gutter along the westbound travel lane (perimeter of the proposed distribution center) and asphalt concrete (AC) dike and landscaped parkway (grass) west of the distribution center and eastbound travel lane. This corridor would connect the proposed Gateway Drive extension and Adelanto Road, in addition to required utility connections, which are described below.

ON-SITE CIRCULATION

Project access would be provided along the new extension of Gateway Drive via four driveways. The northernmost driveway would provide access to inbound/outbound trailer trucks and outbound employee and visitor passenger vehicles. The other three driveways would provide access to inbound/outbound passenger vehicles only. Momentum Road would provide two driveways, with the western driveway providing emergency vehicle access and the eastern driveway providing trailer truck outbound access. On-site trailer truck traffic circulation flows around the proposed distribution building, beginning at the northeastern driveway along Gateway Drive. Vehicular traffic would be restricted to the proposed eastern parking lot. Two guardhouses would be constructed onsite with gated access into the restricted loading dock and trailer parking area. One guardhouse would be constructed within the northwestern portion of the project site. This guardhouse would regulate access of inbound/outbound trailer trucks entering/exiting the northeastern most driveway. The second guardhouse would be constructed near the southeast corner of the distribution building where the trailer trucks are able to exit the restricted area at Momentum Road. This guardhouse would be operational during the peak season. Emergency vehicle access is provided throughout the site. As stated, an emergency vehicle driveway is proposed at the southwestern corner of the site along Momentum Road. At the southeastern portion of the project site, gated access is proposed to provide emergency vehicle access to both the restricted area and the eastern vehicular parking lot and the main entrance of the building.

PARKING

Trailer parking would be provided north, south, and west of the distribution building. Employee and visitor passenger vehicle parking would be provided east of the distribution building. To accommodate the parking needs associated with the distribution and office uses, 396 trailer parking stalls (including electric vehicle (EV) stalls) and 1,010 passenger car parking stalls (including Americans with Disabilities Act (ADA) stalls) are proposed. Bicycle storage is also proposed on-site. The proposed parking would meet or exceed the City's parking requirements as noted in Municipal Code Section 16-3.21.030, for "retail distribution warehouse."

UTILITIES

On-site utilities would include electric, water, and sewer. The existing overhead electric power poles that traverse the site in an east/west direction within the southern portion of the project site would be removed or relocated as part of the project. The project proposes to connect to the existing public water main at the intersection of Gateway Drive and Momentum Road and extend the water main north along Gateway Drive. The proposed domestic water and irrigation water connection for the site would occur northeast of the distribution building. The domestic water line would extend west, north of the distribution building, and connect to the northwest corner of the building. A water line would also connect to the two guardhouses. A fire water line would connect to the public water main extension in Gateway Drive and connect to the proposed water tank on-site. Additionally, a fire water line would extend around the perimeter of the distribution building. Four six-inch sewer laterals would connect the existing sewer main within Gateway Drive to the distribution building. A new sewer line would also extend north and south from the distribution building to the guardhouses. A hydrogen storage and re-fueling area is proposed for PITs in the northeast corner of the northernly trailer parking lot.

LANDSCAPING

Landscaping is proposed on-site including trees, shrubs, ground cover, mulch, and decomposed granite; refer to Exhibit 2-5, *Proposed Landscaping Plan*. The eastern perimeter of the distribution building would include ornamental trees and groundcover. Parking lot medians would include trees and mulch. Low maintenance Santa Clara meadow seed mix would be planted on-site along Gateway Drive and Momentum Road. Evergreen trees and shrubs would be planted in front of the hydrogen storage and re-fueling area screening wall and shrubs would be planted behind the western screening wall/fence. Decomposed granite would be placed east and west of the main guardhouse. The proposed detention basins would be planted with a variety of seed mixes. All proposed landscaping would comply with the SCLA Specific Plan requirements.

DRAINAGE

On-site surface water would be collected at the proposed storm drains located throughout the site and conveyed through the new stormwater pipes to the proposed stormwater detention basins located in the northern portion of the site.

LIGHTING

Nighttime parking lot, vehicle access, pedestrian, and building security lighting are proposed on-site. The types of lighting would include eight-foot post top pedestrian lighting near the main building entrance, 30-foot wall-mounted security lighting along the exterior of the building, and a range of 30-foot single-head to quadrant-head pole mounted lights proposed within the parking lots and vehicle access ways. All proposed lighting would comply with the SCLA Specific Plan requirements.

PHASING AND CONSTRUCTION

The project would be constructed in a single phase. Construction is anticipated to begin in August 2021 with a duration of approximately 12 months.

2.5 PERMITS AND APPROVALS

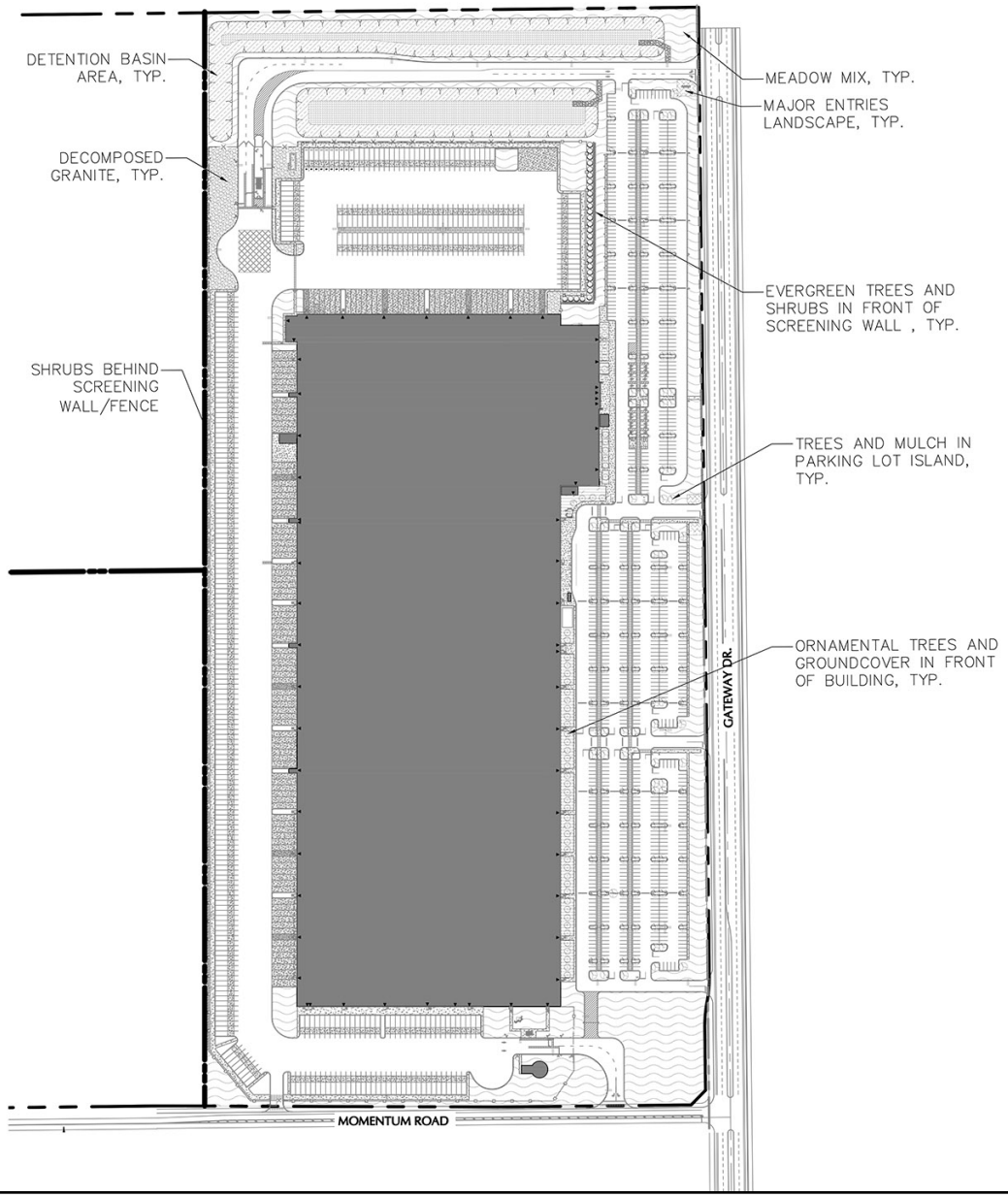
The proposed project would require permits and approvals from the City of Victorville and other agencies prior to construction. These permits and approvals are described below, and may change as the project entitlement process proceeds.

City of Victorville

- California Environmental Quality Act Clearance
- Site Plan Review
- Grading Permit
- Building Permit

Lahontan Regional Water Quality Control Board

- NPDES Construction General Permit



LEGEND

- DETENTION BASIN DRAINFIELD SEED MIX
- DETENTION BASIN DAM SLOPE SEED MIX
- LOW MAINTENANCE SANTA CLARA MEADOW SEED MIX
- TREES IN PARKING LOT ISLAND
  I.E. PROSOPIS, QUERCUS, HESPERALOE
- ORNAMENTAL TREES I.E. ACACIA, ARBUTUS, PROSOPLIS
- GROUNDCOVER I.E. ARTEMISIA, CHILOPSIS, PEROVSKIA
- MAJOR ENTRIES LANDSCAPE
  PLANT SPECIES I.E. ACACIA GREGGI, CERCIDIUM, ARBUTUS UNEDO, MULHENBERGIA RIGENS, ACACIA REDOLENS, AGAVE PARRYI
- EVERGREEN TREES
  PLANT SPECIES I.E. PINUS ELDARICA, ELAEAGNUS PUNGENS, DODONAEA VISCOSA PURPUREA, JUNIPERUS CHINENSIS SPARTAN
- DECOMPOSED GRANITE
- SHRUBS
  PLANT SPECIES I.E. LEUCOPHYLLUM FRUTESCENS, LEUCOPHYLLUM LAEVIGATUM

NOTE: ALL OF PLANT SPECIES TO BE SELECTED FROM 5.3.3 PLANT MATERIAL GUIDELINES, SCLA SPECIFIC PLAN DATED FEB 2021

Source: Langan Engineering and Environmental Services, Inc., April 2021

NOT TO SCALE

Michael Baker INTERNATIONAL

04/2021 JN 182596

SOUTHERN CALIFORNIA LOGISTICS AIRPORT (SCLA) LOT 44 DISTRIBUTION CENTER PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Proposed Landscape Plan

Exhibit 2-5

3.0 INITIAL STUDY CHECKLIST

3.1 BACKGROUND

1.	**Project Title:** Southern California Logistics Airport (SCLA) Lot 44 Distribution Center Project
2.	**Lead Agency Name and Address:** City of Victorville 14343 Civic Drive Victorville, California 92392
3.	**Contact Person and Phone Number:** Mr. Michael Szarzynski Senior Planner 760.955.5135
4.	**Project Location:** The project site is located in the northwestern portion of the City of Victorville, within the western portion of the SCLA Specific Plan. It is situated immediately west of the SCLA, east of Adelanto Road, and approximately 0.5-mile north of Innovation Way.
5.	**Project Sponsor's Name and Address:** Stirling Capital Investments/Lot 44/LLC 27422 Portola Parkway, Suite 300 Foothill Ranch, CA 92610
6.	**General Plan Designation:** Based on the City of Victorville General Plan, the project site is designated Specific Plan.
7.	**Zoning:** Based on the City of Victorville Zoning Map, the project site is zoned Specific Plan.
8.	**Description of the Project:** The proposed project would include construction of a distribution center on approximately 72.2 acres of the SCLA Lot 44 site. The new distribution center would consist of a 1,080,308 square-foot building footprint, which includes 36,241 square feet of office space. The facility would also feature a 250,028 square-foot mezzanine, 98 truck loading docks, 396 trailer parking stalls, and 1,010 passenger vehicle parking spaces. The project would also include approximately 26.4 acres to the south and southwest that would accommodate ancillary utility and roadway improvements. The project proposes to enhance the local economy and municipal revenue, and furnish local employment opportunities for residents, consistent with the goals of the City's General Plan. Additional details regarding the project are provided in Section 2.4, *Project Characteristics*.
9.	**Surrounding Land Uses and Setting:** Surrounding land uses in proximity to the project site are primarily comprised of airport, industrial, residential, and vacant land. The surrounding land uses are as follows: • North: The site is bound by disturbed, vacant land to the north. • East: SCLA runways and airport support facilities are situated to the east. • South: Industrial uses are located south of the project site (Dr. Pepper/Snapple facility). • West: The project site is bounded to the west by vacant/disturbed land and Adelanto Road. Further west of Adelanto Road, within the City of Adelanto, are a mix of single-family residential and industrial uses.

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

Refer to Section 2.5, *Permits and Approvals*, for a description of the permits and approvals anticipated to be required for the project. Additional approvals may be required as the project entitlement process moves forward.

3.2 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" or "Less Than Significant Impact With Mitigation Incorporated," as indicated by the checklist on the following pages.

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

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

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

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the *CEQA Guidelines* and used by the City of Victorville in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation, which has been completed as part of this evaluation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

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

- *Less Than Significant Impact*. The development will have the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.

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

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

Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels.

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4.0 ENVIRONMENTAL ANALYSIS

The following is a discussion of potential project impacts as identified in the Initial Study/Mitigated Negative Declaration. Explanations are provided for each item.

4.1 AESTHETICS

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

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

Less Than Significant With Mitigation Incorporated.

The existing project site affords partial or full views of the mountains surrounding the City. The General Plan refers to the mountains surrounding the City as scenic vistas of Victor Valley. These mountains include the Quartzite Mountain to the east, the Mojave Narrows to the southeast, and the San Bernardino and San Gabriel Mountain ranges to the south. Distant views of these scenic resources can be experienced from the project site and by motorists, pedestrians, and bicyclists traveling along local roadways within the project vicinity.

Long-Term Impacts

The project area is generally developed with airport, commercial, industrial, and warehousing/distribution uses. Although the proposed project would result in the development of a new structure on existing vacant land, the distribution building would be compatible with development in the surrounding area. The proposed building would have a maximum height of 52 feet 4 inches, which would be compatible with the SCLA Specific Plan. The proposed building would be located approximately 1,000 feet from the nearest sensitive viewers located west of the project site. New development associated with the project would not have the capacity to substantially change available views of surrounding scenic views or vistas. As such, it is not anticipated that views would be substantially obstructed with the implementation of the project and less than significant impacts would occur in this regard.

Short-Term Impacts

Construction activities are anticipated to occur over a period of 12 months. Construction activities for the project, such as clearing, grading, and building activities would be visible to viewers from surrounding land uses and roadways. Although views towards the project site may temporarily be altered by ground disturbance and construction equipment,

these potential impacts would be short-term in nature and would cease upon completion of the construction phase. Implementation of Mitigation Measure AES-1 would require construction staging areas include opaque screening materials to shield public views toward the site throughout the construction process. With implementation of this mitigation measure, short-term construction impacts would be less than significant.

Mitigation Measures:

AES-1 Construction equipment staging areas shall be screened (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material, when feasible. Staging locations shall be approved by the City of Victorville Development Department and indicated on Final Grading and Building Plans.

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

No Impact. There are no officially designated State scenic highways within a close proximity to the project. Historic Route 66 (National Trails Highway) is designated as a County of San Bernardino Scenic Highway and is located approximately 3.5 miles east of the project site. Due to distance, intervening structures and topography, views of the project site are not readily afforded from National Trails Highway. As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated.

Long-Term Impacts

As indicated in Section 2.0, *Project Description*, the project site is situated in an urbanized area. Surrounding land uses include a mixture of vacant, residential, industrial uses. The project site is designated as "I" for Industrial within the SCLA Specific Plan. As indicated in Response 4.1(a), the project would be similar in characteristics, mass, and height to nearby industrial and airport facilities. Additionally, the project would comply with the development standards outlined in the SCLA Specific Plan for development in the Industrial designation, including the maximum height and minimum setback development standards, landscaping, fences/walls, exterior lighting, and signage requirements for proposed industrial uses that is outlined in the SCLA Specific Plan.
Additionally, the project would undergo a site plan review through the City's Planning Commission for approval. Although the visual character of the site and surrounding area would be altered by the proposed project, consistency with development standards and design guidelines associated with the SCLA Specific Plan would reduce potential visual character and quality impacts associated with future development of the site to a less than significant level.

Short-Term Impacts

The project would construct new distribution center on vacant, disturbed land. The construction phase of the project is expected to occur over 12 months. During this time, construction-related activities associated with the proposed project would temporarily alter the existing visual character of the project site and surrounding area for sensitive viewers (such as residential viewers and motorists). The visual impacts associated with construction activities would involve graded surfaces, construction materials, equipment, and truck traffic. As noted above in Response 4.1(a), although views towards the project site may temporarily be altered by ground disturbance and construction equipment, these potential impacts would be short-term in nature and would cease upon completion of the construction phase. Implementation of Mitigation Measure AES-1 would require construction staging areas include opaque screening

materials to shield public views toward the site throughout the construction process. With implementation of this mitigation measure, short-term construction impacts would be less than significant.

Mitigation Measures: Refer to Mitigation Measure AES-1.

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

Less Than Significant Impact With Mitigation Incorporated. There are two primary sources of light: light emanating from building interiors that pass-through windows and light from exterior sources (i.e., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). Depending upon the location of the light source and its proximity to adjacent light sensitive uses, light introduction can be a nuisance, affecting adjacent areas and diminishing the view of the clear night sky.

Long-Term Impacts

Since the project site is currently undeveloped and vacant, there are no sources existing sources of light and glare. Currently, light and glare are being emitted from surrounding uses, including street lighting and vehicle headlights along Adelanto Road to the west, exterior lighting of industrial/airport facilities to the east, and residential uses to the west.

The proposed project would increase lighting at the project site as compared to existing conditions. Nighttime security lighting would be required for operations, security, and safety. The proposed project would comply with lighting design guidelines outlined in the SCLA Specific Plan. As required by the Specific Plan, light fixtures would not exceed a maximum height of 30 feet, and lighting would be designed to minimize light spill onto adjacent areas and to protect the night sky for the airport. The Specific Plan provides requirements for narrow spectrum LED lighting, wall versus pole-mounted lighting, and requirements for light intensity and energy efficiency. With adherence to these requirements, impacts related to nighttime lighting would be less than significant.

Vehicle headlights entering and exiting the project's parking lot from the proposed extension of Gateway Drive could also result in increased lighting in the project vicinity. However, light sensitive viewers would be approximately 2,000 feet west of the proposed extension of Gateway Drive, which would serve as the primary ingress/egress route for the distribution center. As a result, vehicle headlights are not anticipated to result in a substantial increase in light/glare conditions in the area, and impacts would be less than significant.

Short-Term Impacts

Construction activities would occur during the daytime hours. In compliance with Adelanto Municipal Code Section 17.90.020(1), construction occurring adjacent to the City of Adelanto would be limited to the hours between 7:00 a.m. to dusk on weekdays and is prohibited on weekends or State holidays. The Victorville Municipal Code does not specify acceptable construction hours of operation. Light and glare during daytime construction activities would not impact surrounding uses. In the event that construction would require nighttime lighting (for security purposes) in the evening hours, the project applicant would be required to comply with Mitigation Measure AES-2, which would require all security lighting fixtures on-site to point downward and away from airport runways. With the implementation Measure AES-2, short-term impacts regarding light and glare would be reduced to less than significant.

Mitigation Measure:

AES-2 All construction-related lighting fixtures (including portable fixtures) shall be oriented downward and away from adjacent sensitive receptors and airport runways. Lighting shall consist of the minimal wattage necessary to provide safety at the construction site. A construction lighting plan shall be submitted to the City of Victorville Development Department for review concurrent with Grading Permit application.

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

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

No Impact. Per the California Department of Conservation, the project site is situated within "Urban and Build-Up Land" and "Grazing Land."[1] Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance do not occur within or adjacent to the project site. Therefore, the proposed project would not result in any impacts to agricultural operations and would not convert any farmland to non-agricultural use. Thus, no impacts would result in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The proposed project site is zoned Specific Plan, and has an Industrial land use designation under the SCLA Specific Plan. As such, no zoning for agricultural use currently applies to the project site or the surrounding

[1] California Department of Conservation, *Farmland Mapping and Monitoring Program, California Important Farmland Finder*, http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx, accessed April 10, 2021.

areas. Additionally, the project site is not part of a Williamson Act contract. Thus, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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))?

No Impact. Refer to Response 4.2 (b). No zoning for forest land or timberland exists within the project site, and no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Responses 4.2 (b) and 4.2 (c). No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. As stated above in Responses 4.2(a) through 4.2(d), the project site occurs within a vacant area and is void of agricultural or forest resources. Thus, there is no potential for the conversion of these resources and no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

4.3 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:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		✓		
d. Expose sensitive receptors to substantial pollutant concentrations?			✓	
e. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			✓	

REGULATORY SETTING

Federal 8-hour Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)

On April 15, 2004, the U.S. Environmental Protection Agency (EPA) designated the Western Mojave Desert nonattainment area as nonattainment for the 8-hour ozone National Ambient Air Quality Standards (NAAQS) pursuant to the provisions of the Federal Clean Air Act (FCAA). The Western Mojave Desert Ozone Nonattainment Area (WMDONA) includes part of the San Bernardino County, a portion of the Mojave Desert Air Quality Management District (MDAQMD), as well as the Antelope Valley portion of Los Angeles County. As a result, the MDAQMD prepared its Ozone Attainment Plan in June 2008 to: (1) demonstrate that the MDAQMD will meet the primary required Federal ozone planning milestones, attainment of the 8-hour ozone NAAQS by 2019 (revised from June 2021); (2) present the progress the MDAQMD will make towards meeting all required ozone planning milestones; and (3) discuss the newest 0.075 part per million (ppm) 8-hour ozone NAAQS, preparatory to an expected nonattainment designation for the new NAAQS. In February 2017, MDAQMD updated the 2008 Ozone Attainment Plan and adopted the *MDAQMD Federal 75 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Plan)* to satisfy FCAA requirements that the MDAQMD develop a plan to attain the 0.075 ppm 8-hour ozone NAAQS.

Final Mojave Desert Planning Area Federal Particulate Matter 10 (PM_{10}) Attainment Plan

On January 20, 1994, the EPA re-designated a significant portion of the Mojave Desert as a nonattainment area with respect to the NAAQS for PM_{10}. This nonattainment area covers a vast geographical region, including the urban areas of Victor Valley and Barstow, the Morongo Basin, along with the rural desert environs reaching to the Nevada and Arizona state lines. The PM_{10} Attainment Plan was prepared in July 1995 to provide a complete description and submittal to EPA of the PM_{10} attainment planning elements which the MDAQMD will implement to bring the nonattainment area into compliance with federal law. Most importantly, the PM_{10} Attainment Plan serves as a planning tool for reducing PM_{10} pollution. The PM_{10} Attainment Plan sets forth an air quality improvement program for the region which will be implemented by both the public and private sector of the community.

Air Quality 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. MDAQMD would clarify upon request which threshold is most appropriate for a given project; in general, the emissions comparison (criteria number 1) is sufficient:

1) Generates total emissions (direct and indirect) in excess of the thresholds given in Table 4.3-1, *MDAQMD Significant Emissions Thresholds*;

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

3) Does not conform with the applicable attainment or maintenance plan(s);[1] and/or

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

A significant impact 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. Note that the emission thresholds are given as a daily value and an annual value, so that multi-phased project (such as project with a construction phase and a separate operational phase) with phases shorter than one year can be compared to the daily value.

Table 4.3-1
MDAQMD Significant Emissions Thresholds

Criteria Pollutant	Annual Threshold (tons)	Daily Threshold (pounds)
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO_X)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO_X)	25	137
Particulate Matter (PM_{10})	15	82
Fine Particulate Matter ($PM_{2.5}$)	12	65
Hydrogen Sulfide (H_2S)	10	54
Lead (Pb)	0.6	3
Source: Mojave Desert Air Quality Management District, *CEQA and Federal Conformity Guidelines*, page 9, August 2016.		

City of Victorville

Victorville General Plan 2030

City of Victorville (City) policies and implementation measures pertaining to air quality are contained in the Resource Element of the *Victorville General Plan 2030* (General Plan). These policies and implementation measures include the following:

- **Policy 6.1.1**: Encourage planning and development activities, that reduce the number and length of single occupant automobile trips.

  Implementation Measure 6.1.1.1: Require large projects (exceeding 150,000 square feet of development) to incorporate Transportation Demand Management (TDM) techniques, such as promoting carpooling and transit, as a condition of project approval.

  Implementation Measure 6.1.1.2: Require dust abatement actions for all new construction and redevelopment projects.

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

- **Policy 6.2.1**: Encourage compliance with the California Air Resources Board (CARB) "Air Quality and Land Use Handbook: A Community Health Perspective", which provides guidelines for siting new sensitive land uses in proximity to air pollutant emitting sources.

  Implementation Measure 6.2.1.1: Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

  Implementation Measure 6.2.1.2: Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU operations exceed 300 hours per week).

IMPACT ANALYSIS

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

Less Than Significant Impact. The project site is located within the Mojave Desert Air Basin (Basin) and is regulated by the MDAQMD. The MDAQMD PM_{10} Attainment Plan and Ozone Attainment Plan established under the Western Mojave Desert Air Quality Management Plans (AQMPs) set forth a comprehensive set of programs that will lead the Basin into compliance with Federal and State air quality standards. The control measures and related emission reduction estimates within the MDAQMD PM_{10} 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 is determined by demonstrating compliance with:

- Local land use plans and/or population projections (**Criterion 1**);
- All MDAQMD Rules and Regulations (**Criterion 2**); and
- Demonstrating the project will not increase the frequency or severity of a violation in the Federal or State ambient air quality standards (**Criterion 3**).

Criterion 1

Growth projections included in the AQMPs form the basis for the projections of air pollutant emissions and are based on general plan land use designations and the Southern California Association of Governments (SCAG) *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS) demographics forecasts. While SCAG has recently adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS), the MDAQMD has not released an updated AQMP that utilizes information from the 2020-2045 RTP/SCS. As such, this consistency analysis is based off the 2016-2040 RTP/SCS. The population, housing, and employment forecasts within the 2016-2040 RTP/SCS are based on local general plans as well as input from local governments, such as the City. The MDAQMD has incorporated these same demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment) into the AQMPs.

The project proposes the development of a distribution facility. Based on the *City of Victorville General Plan Land Use Policy and Zoning Map* (Victorville Land Use and Zoning Map), the project site is designated/zoned Specific Plan. The Southern California Logistics Airport (SCLA) Specific Plan designates the project site as Industrial (I). The Industrial designation is intended for development of a broad range of industrial activities, including larger scale industrial. A range of permitted uses include distribution centers, processing facilities, heavy/light manufacturing, and warehousing, among others. Therefore, the proposed project would be consistent with the site's land use designation, and consistent with the types, intensity, and patterns of land use envisioned for the site.

The City's population estimate as of January 1, 2020 is 126,432 persons.[2] As discussed in Section 5.12, *Population and Housing,* while the project does not involve residential development, the project would employ approximately 850 people and could indirectly induce population growth if future employees move into the City to work at the distribution facility. While it is likely that future employees already live in the City or would commute in from neighboring jurisdictions, this analysis conservatively assumes all 850 future employees would move into the City for employment. Based on an average household size of 3.45[3], the project would result in an indirect population increase of approximately 2,933 persons.

SCAG growth forecasts in the 2016-2040 RTP/SCS estimate the City's population to reach 184,500 persons by 2040, representing a total increase of 64,900 persons between 2012 and 2040.[4] The project's potential indirect population growth (2,933 persons) represents approximately 4.52 percent of the City's anticipated population increase by 2040, and only 1.59 percent of the City's total projected 2040 population.

Additionally, SCAG growth forecasts in the 2016-2040 RTP/SCS estimate the City's employment to reach 52,700 jobs by 2040, representing a total increase of 22,900 jobs between 2012 and 2040.[5] The approximately 850 project-generated jobs represent 3.71 percent of the City's anticipated jobs increase by 2040, and only 1.61 percent of the City's total projected 2040 employment.

Therefore, the indirectly induced population growth as a result of the proposed project would not cause the SCAG growth forecast to be exceeded. As the MDAQMD has incorporated these forecasts on population, housing, and employment into the AQMPs, it could be concluded that the proposed project would be consistent with the AQMPs. Impacts would be less than significant in this regard.

Criterion 2

The proposed project would be required to comply with all applicable MDAQMD Rules and Regulations. This would include MDAQMD Rule 403, which requires periodic watering for short-term stabilization of disturbed surface area to minimize visible fugitive dust (PM_{10}) emissions, covering loaded haul vehicles, and reduction of non-essential earth moving activities during higher wind conditions. The proposed project would also comply with MDAQMD Rule 1113, which requires the use of low VOC paints. Thus, the proposed project would not conflict with applicable MDAQMD Rules and Regulations. Impacts would be less than significant in this regard.

Criterion 3

Since the consistency criteria identified under Criterion 3 pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations associated with the California Ambient Air Quality Standards (CAAQS) and NAAQS is used as the basis for evaluating project consistency. As discussed under Response 4.3(b), the proposed project short-term construction and long-term operation would comply with all applicable MDAQMD rules and regulation, and short-term construction and long-term operation emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant. Therefore, the project would not delay the Basin's attainment goals for ozone (O_3)[6], PM_{10}, and $PM_{2.5}$, and would not result in an increase in the frequency or severity of existing air quality violations. As such, the proposed project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMPs. Impacts would be less than significant in this regard.

[2] State of California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark*, May 2020.
[3] Ibid.
[4] Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Demographics & Growth Forecast Appendix*, April 2016.
[5] Ibid.
[6] Ground level O_3 is created during a photochemical reaction from NO_X and ROG emissions.

Conclusion

The proposed project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMPs. Thus, the proposed project would not result in or cause NAAQS or CAAQS violations. As such, a less than significant impact would occur with regard to the project's consistency with the MDAQMD's AQMPs.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation.

Criteria Pollutants

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of CO.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" O_3 layer) extends upward from about ten to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays. "Bad" O_3 is a photochemical pollutant, and needs volatile organic compounds (VOCs), nitrogen dioxide (NO_X), and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O_3 in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. O_3 is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of O_3. Short-term exposure (lasting for a few hours) to O_3 at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide (NO_2). NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_X) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, CARB adopted amendments to the Statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both State and Federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new $PM_{2.5}$ standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On June 20, 2002, CARB adopted amendments for Statewide annual ambient particulate matter air quality standards. These standards were revised and established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current State standards during some parts of the year, and the Statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell that is primarily formed by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with sulfur oxides (SO_X). Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are criteria pollutants since they are precursors to O_3, which is a criteria pollutant. The terms VOC and ROG (see below) are usually used interchangeably.

Reactive Organic Gases (ROG). Similar to VOC, ROG are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_x react in the presence of sunlight. ROGs are criteria pollutants since they are precursors to O_3, which is a criteria pollutant.

Short-Term Construction Emissions

The project involves construction activities associated with grading, on-site earthwork, building construction, paving, and architectural coatings. The project would be constructed over approximately 12 months. The proposed earthwork would involve approximately import of 12,100 cubic yards of soil and export of 1,500 tons of demolition waste. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod; refer to Appendix A, *Air Quality/Greenhouse Gas/Energy/Health Risk Data*, for the CalEEMod outputs and results. Table 4.3-2, *Construction Emissions*, presents the anticipated daily short-term construction emissions.

Table 4.3-2
Construction Emissions

Emissions Source	Pollutant (pounds/day)[1,2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions[2,3]						
Year 1	13.30	129.67	95.95	0.37	22.01	8.51
Year 2	92.22	79.18	81.57	0.30	18.26	6.01
MDAQMD Threshold	*137*	*137*	*548*	*137*	*82*	*65*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: ROG = reactive organic gases; NO_X = nitrous oxides; CO = carbon monoxide; SO_2 = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Emissions were calculated using CalEEMod version 2016.3.2. Winter emissions represent worst-case.
2. The reduction/credits for construction emissions are based on "mitigation" included in CalEEMod and are required by the MDAQMD Rule 403.2, which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces twice daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Further, the project would comply with MDAQMD Rule 1113 which restricts the VOC content of architectural coating applications. The emissions results in this table represent the "mitigated" emissions shown in Appendix A.
3. The project's 12-month construction schedule would occur over two calendar years.

Refer to Appendix A, *Air Quality/Greenhouse Gas /Energy/Health Risk Data*, for assumptions used in this analysis.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading, site preparation, and construction is expected to be short-term and would cease upon project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

The project would implement all required MDAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adhere to MDAQMD Rule 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM_{10} and $PM_{2.5}$ concentrations. As noted in Table 4.3-2, total PM_{10} and $PM_{2.5}$ emissions would not exceed MDAQMD thresholds during construction. Thus, construction air quality impacts would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, employee commutes to the project site, emissions produced on-site as equipment is used, and emissions from trucks transporting materials to/from the site. As presented in Table 4.3-2, construction equipment and worker vehicle exhaust emissions would not exceed the established MDAQMD threshold for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the MDAQMD, the ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. The project would comply with MDAQMD Rule 1113, which requires the use of low ROG paints. ROG emissions associated with the proposed project would be less than significant; refer to Table 4.3-2.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are human health hazards when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report* (August 2000), serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact in this regard.

Long-Term Operational Emissions

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. Emissions associated with each of these sources were calculated and are discussed below.

Mobile Source

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using CalEEMod and CARB's EMissions FACtor 2017 (EMFAC2017). According to the *SCLA Lot 44 Proposed Non-Sort Facility ITE Trip Generation Table* (Trip Generation Table) prepared by Michael Baker International (March 2021), the proposed project would generate approximately

1,987 total daily trips, including 616 truck trips. Table 4.3-3, *Long-Term Air Emissions*, presents the anticipated mobile source emissions due to the project.

Table 4.3-3
Long-Term Air Emissions

Emissions Source	Pollutant (pounds/day)[1,3]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Area	23.57	<0.01	0.14	<0.01	<0.01	<0.01
Energy	0.05	0.42	0.35	<0.01	0.03	0.03
Mobile[3]	3.17	33.31	36.52	0.20	13.13	3.80
Total Summer Emissions[2]	***26.78***	***33.72***	***37.01***	***0.20***	***13.16***	***3.83***
MDAQMD Threshold	*137*	*137*	*548*	*137*	*82*	*65*
Is Threshold Exceeded? (Significant Impact?)	***No***	***No***	***No***	***No***	***No***	***No***
Project Winter Emissions						
Area	23.57	<0.01	0.14	<0.01	<0.01	<0.01
Energy	0.05	0.42	0.35	<0.01	0.03	0.03
Mobile[3]	2.80	35.02	33.42	0.19	13.13	3.80
Total Winter Emissions[3]	***26.42***	***35.43***	***33.90***	***0.19***	***13.16***	***3.83***
MDAQMD Threshold	*137*	*137*	*548*	*137*	*82*	*65*
Is Threshold Exceeded? (Significant Impact?)	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions were calculated using CalEEMod version 2016.3.2.
2. The numbers may be slightly off due to rounding.
3. Vehicle emission factors for the project's operational year were calculated using EMFAC2017.

Refer to Appendix A, *Air Quality/Greenhouse Gas /Energy/Health Risk Data*, for assumptions used in this analysis.

Area Source Emissions

Area source emissions are generated from consumer products, architectural coating, and landscaping. The project would be required to comply with MDAQMD Rule 1113. MDAQMD Rule 1113 restricts the VOC content of architectural coatings, reducing ROG emissions. In addition, consistent with the SCLA Specific Plan Environmental Impact Report (dated February 2021), the project would implement Mitigation Measures AQ-1 and AQ-2 that require low VOC consumer products and all electric landscaping equipment, which would further reduce area source emissions. As seen in Table 4.3-3, with the implementation of Mitigation Measures AQ-1 and AQ-2, the project's ROG emissions would not exceed MDAQMD thresholds.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas usage associated with the proposed project; refer to Table 4.3-3. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

Total Operational Emissions

As shown in Table 4.3-3, the total operational emissions for both summer and winter would not exceed established MDAQMD thresholds. Therefore, impacts in this regard would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors, VOCs and NO_x, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants during construction would have negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD),[7] the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD),[8] SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD further states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_x and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_x or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the project would not exceed SCAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

Cumulative Short-Term Construction Impacts

With respect to the proposed project's construction-period air quality emissions and cumulative Basin-wide conditions, the MDAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMPs pursuant to FCAA mandates. As such, the proposed project would comply with MDAQMD Rule 403 requirements and implement all feasible MDAQMD rules to reduce construction air emissions to the extent feasible. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the proposed project. In addition, the proposed project would comply with adopted AQMPs emissions control measures. Implementation of MDAQMD Rule 403 and the AQMPs emissions control measures would help the project reduce its emissions from construction activities. Pursuant to MDAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible mitigation measures, and compliance with adopted AQMPs emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

As discussed above, the project's short-term construction emissions would be below the MDAQMD thresholds and would result in less than significant air quality impacts. Thus, it can be reasonably inferred that the project's construction

[7] South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

[8] San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin. A less than significant impact would occur in this regard.

Cumulative Long-Term Operational Impacts

As discussed, the proposed project would not result in long-term operational air quality impacts. Additionally, adherence to MDAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the proposed project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, no cumulative operational impacts associated with implementation of the proposed project would result.

Mitigation Measures: The following mitigation measures would be implemented during project operation.

AQ-1 The proposed project shall incorporate the use of low volatile organic compound (VOC) cleaning products that go beyond the requirements set in the Mojave Desert Air Quality Management District (MDAQMD) Rule 442 – Usage of Solvents. A copy of specification for each type of cleaning product to be used shall be provided to the City of Victorville for verification before issuance of building permit(s).

AQ-2 The proposed project shall implement the following:

- The installation of outdoor electrical outlets on buildings and within parking lots to support the use, where practical, of electric lawn and garden equipment, and other tools that would otherwise be run with small gas engines or portable generators.

- All landscaping equipment (e.g., lawnmowers, leaf blowers, chainsaws) used within the proposed development shall be 100 percent electric.

The final building design plans showing outdoor electrical outlets shall be provided to the City of Victorville before issuance of building permits.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The closest sensitive receptors to the project site are residences located directly to the west of the project site. Specifically, the nearest sensitive receptor property line is located in the City of Adelanto, approximately 50 feet from the proposed Gateway Drive improvements and approximately 700 feet to the west of the distribution center site boundaries.

Toxic Air Contaminants

Per CARB's *Air Quality and Land Use Handbook*, an assessment of Toxic Air Contaminant (TAC) impacts is warranted when siting sensitive receptors located within 1,000 feet of a distribution center that accommodates more than 100 trucks per day. Based on the Trip Generation Table, the project would generate 616 truck trips per day. Therefore, a Health Risk Assessment (HRA) was conducted to evaluate the project's operational diesel particulate matter (DPM) emissions from heavy-duty truck trips and the potential health risk at nearby sensitive receptors.

Health Risk Assessment Thresholds

In order to determine whether or not a proposed project would cause a significant health risk effect on the environment, the impact of the project must be determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the purview of the lead agency pursuant to the CEQA Guidelines, the MDAQMD recommends that the following thresholds be used by lead agencies in determining whether the health impact of the proposed project is significant. The thresholds for air toxic emissions are as follows:

- *Cancer Risk*: Emit carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million.

- *Non-Cancer Risk*: Emit toxic contaminants that exceed the maximum hazard quotient of 1.0.

Cancer risk is expressed in terms of expected incremental incidence per million population. The MDAQMD has established an incidence rate of 10 persons per one million as the maximum acceptable incremental cancer risk due to DPM exposure. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulative impact.

The MDAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below, which health effects are not likely to occur. A hazard index of less than one (1.0) means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less than significant.

Sensitive Receptors

Due to the location and spacing of the sensitive receptors and the location of all truck hauling roads, receptors were modeled with a 100-meter (82 feet) by 100-meter (82 feet) grid spacing over an approximately 4.0 kilometer (km) by 4.0 km area (UCART2); refer to Appendix A. In addition, smaller sensitive receptor grids of 5 meters (16 feet) by 5 meters (16 feet) were modeled over nearby sensitive receptor locations of concern:

- Residential neighborhood to the southwest of the project site, west of Adelanto Road (UCART1); and

- Warehouse representing workers to the south of the project site, west of Gateway Drive (UCART2).

In total, 12,459 individual sensitive receptor locations were modeled over the 4.0 km by 4.0 km site domain in order to capture the maximum individual cancer risk (MICR) due to the operation of the project; refer to Appendix A for the modeling results at these sensitive receptor locations. The United States Geological Survey (USGS) 1/3 arc-second (about 10 meters) National Elevation Dataset (NED) terrain data was processed with AERMAP[9] and imported into AERMOD for the project area.

Health Risk Assessment Methodology

The air dispersion modeling for the HRA was performed using the AERMOD dispersion model version 19191. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class,

[9] U.S. Environmental Protection Agency, *User's Guide for the AERMOD Terrain Preprocessor (AERMAP)*, https://www3.epa.gov/ttn/scram/models/aermod/aermap/aermap_userguide_v18081.pdf, accessed April 16, 2021.

and mixing height. Surface and upper air meteorological data provided by the CARB for the Southern California Logistics Airport was selected as being the most representative meteorology based on proximity.[10]

According to the Trip Generation Table, the project would generate 1,987 total daily trips, including 1,371 passenger car trips and 616 truck trips.[11] On-site emission sources in the model include three line volume sources modeled surrounding the warehouse (comprised of 76 volume sources) to model truck movement and maneuvering. It should be noted that the project would not accommodate transport refrigeration units (TRUs) on-site, and the project employs zero idling policy with the notice posted on the inbound guard shack and noted when each driver checks in at the yard. Therefore, no sources were modeled for TRUs or truck idling. The off-site emission sources in the model include eight line volume sources along: Adelanto Road, Gateway Drive, Chamberlain Way, Momentum, Bartlett Avenue, and Innovation Way. These off-site emissions sources are comprised of a total of 410 volume sources and represent the off-site truck movement on adjacent roadways. An emission rate for PM_{10} (DPM) was calculated using EMFAC2017[12] model run for MDAQMD region of San Bernardino County. Plume height and plume width of the emissions from heavy trucks were calculated using Haul Road Volume Source Calculator built in AERMOD using roadway width of each roadway segment and vehicle height of 4.27 meters (14 feet) in compliance with the California Vehicle Code (CVC) Section 35250. Refer to Appendix A, for all emission calculations, EMFAC2017 model runs, and AERMOD results.

The model was run to obtain the peak one-hour and period (annual) average concentration in micrograms per cubic meter [µg/m^3] at nearby sensitive receptors. The air dispersion modeling was done to estimate (a) annual average concentrations to calculate the MICR, the maximum chronic hazard index (HI), the zones of impact, and excess cancer burden; and (b) peak hourly concentrations to calculate the health impact from substances with acute non-cancer health effects.

The Hotspots Analysis and Reporting Program Version 2 (HARP2) Air Dispersion and Risk Tool (ADMRT) was employed to calculate the health risks of the project on the sensitive receptors near the project site. HARP2 was created for the purpose of assisting and supporting the local California Air Pollution Control and Air Quality Management Districts with implementing the requirements of Assembly Bill (AB) 2588. Although designed to meet the programmatic requirements of the Air Toxics "Hot Spots" Program (AB 2588), HARP2 modules have also been used for preparing risk assessments for other air related programs (e.g., air toxic control measure development, facility permitting applications, roads, ambient monitoring evaluations, CEQA reviews). A health risk computation was performed to determine the potential risk using the maximum annual average and the risk of developing an excess cancer was calculated on a 30-year exposure scenario for nearby residential sensitive receptors and a 25-year exposure scenario for nearby workers. The chronic and carcinogenic health risk calculations are based on the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (Guidance Manual).

Note that the concentration estimate developed using this methodology is considered conservative and is not a specific prediction of the actual concentrations that would occur as a result of the project any one point in time. Actual one-hour and annual average and concentrations are dependent on many variables, particularly the number and type of equipment working at specific distances during time periods of adverse meteorology.

Carcinogenic Risk

Based on the AERMOD outputs, the highest expected annual average DPM emission concentrations resulting from operation of the project (616 daily truck trips) at a grid receptor point would be 0.01207 µg/m^3. This level of concentration would be experienced to the north of the project site. It should be noted that there are no workers or residences present at this grid receptor location. The highest expected annual average DPM emission concentration at a receptor location representing a worker would be approximately 0.00532 µg/m^3 to the south of the project site,

[10] California Air Resources Board, *HARP AERMOD Meteorological Files*, https://ww2.arb.ca.gov/resources/documents/harp-aermod-meteorological-files, accessed April 16, 2021.
[11] These 616 truck trips are split between 135 2-axle truck trips, 109 3-axle truck trips, and 372 4+-axle truck trips.
[12] California Air Resources Board, *EMFAC2017 Web Database,* https://www.arb.ca.gov/emfac/2017/, accessed April 16, 2021.

and the highest expected annual average emission concentration at a receptor location representing a residence would be approximately 0.00113 µg/m^3 to the southwest of the project site; refer to Appendix A. It is acknowledged that the calculations conservatively assume no cleaner technology with lower emissions would occur in future years. Cancer risk calculations are based on 30-year exposure period for residences and 25-year exposure period for workers. As shown in Table 4.3-4, *Project Maximum Individual Cancer Risk*, the highest calculated carcinogenic risk from project implementation is 0.978 per million for 30-year residence exposure and 0.329 per million for 25-year worker exposure. As shown, impacts related to cancer risk and DPM concentrations from heavy trucks would be less than significant at nearby sensitive receptors.

Table 4.3-4
Project Maximum Individual Cancer Risk

Exposure Scenario	Maximum Individual Cancer Risk (Risk per Million)[1]	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
30-Year Residence Exposure[2]	0.978	10	No
25-Year Worker Exposure[3]	0.329	10	No

Notes:
1. Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy/Health Risk Data*.
2. The maximum cancer risk at a sensitive receptor would be experienced at UTM NAD83 Zone 11N coordinate location 463244.02, 3827284.25 to the southwest of the project site.
3. The maximum cancer risk within the modeling domain would be experienced at UTM NAD83 Zone 11N coordinate location 463812.96, 3827089.43 to the south of the project site.

Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy/Health Risk Data*, for detailed model input/output data.

Non-Carcinogenic Hazards

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the REL for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. The potential for acute non-cancer hazards is evaluated by comparing the maximum short-term exposure level to an acute REL. RELs are designed to protect sensitive individuals within the population. The calculation of acute non-cancer impacts is similar to the procedure for chronic non-cancer impacts. Currently, OEHHA has not set an acute REL for DPM. To be conservative, the acute REL for Acrolein is used instead given that Acrolein is a major component of diesel exhaust and is considered the worst-case acute REL for diesel exhaust emissions.

An acute or chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the REL. The highest maximum chronic and acute hazard index associated with the emissions from the project at sensitive receptors would be 0.00106 and 0.0310, respectively; refer to Appendix A. Therefore, non-carcinogenic hazards are calculated to be within acceptable limits and a less than significant impact would occur.

As described, non-carcinogenic hazards resulting from the proposed project are calculated to be within acceptable limits. Additionally, impacts related to cancer risk associated with DPM emissions from warehouse operations would be less than significant. Therefore, impacts related to health risk from project operations would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

In order to identify CO hotspots, the SCAQMD criterion was utilized since the MDAQMD does not currently have a preferred methodology. The SCAQMD requires a quantified assessment of CO hotspots when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (two percent) for any intersection with an existing level of service (LOS) D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

The Basin is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased. Nationwide estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[13] CO emissions have continued to decline since this time. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's 2003 Air Quality Management Plan. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin, and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the proposed project, since it represents a worst-case scenario with heavy traffic volumes.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm 1-hr CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily trip (ADT) of approximately 100,000 vehicles per day. The proposed project would generate 1,987 ADTs. The proposed project ADTs would not be condensed to a single location and as shown in *the Lot 44 Roadway Segment Average Daily Traffic Estimates Table* (ADT Study), prepared by Michael Baker International (March 2021), the largest percentage of trips along a local roadway where queuing could occur would be along Gateway Drive and Air Expressway. According to the ADT Study, Gateway Drive and Air Expressway would have a total volume of 3,600 ADTs and 14,400 ADTs, respectively, under the Opening Year 2022 with project condition. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection (100,000 vehicle trips per day), it can be reasonably inferred that CO hotspots would not be experienced at any intersections within or near the project site due to the lower volume of traffic (3,600 ADTs along Gateway Drive and 14,400 ADTs along Air Expressway) that would occur as a result of project implementation. Therefore, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. According to CARB's *Air Quality and Land Use Handbook*[14], land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project includes construction of a distribution facility and does not include any uses identified by the CARB as being associated with odors. Furthermore, the proposed project would employ zero idling policy with notice posted on the inbound guard shack and noted when each driver checks in at the yard, which would further minimize idling emissions and possible odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13,

[13] United States Environmental Protection Agency, *Carbon Monoxide Emissions*, https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10, accessed April 26, 2021.
[14] California Air Resources Board, *Air Quality and Land Use Handbook*, April 2005.

Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce detectable odors from heavy-duty equipment exhaust. The project would also comply with the MDAQMD *Rule 1113 – Architectural Coating*, which would minimize odor impacts from ROG emissions during architectural coating. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or 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?				✓

This section is based on the *SCLA Lot 44 Biological Resources Report* (Biological Report) prepared by Michael Baker International (dated April 29, 2021); refer to Appendix B, *Biological Resources Analysis*.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is situated in the greater Mojave Desert and is surrounded by developed and undeveloped properties. Natural habitats within the project site have been eliminated due to aviation, storage, and development activities associated with the SCLA as well as routine weed abatement activities (i.e., disking, tilling), resulting in heavily disturbed and compacted surface soils throughout. As such, native vegetation communities do not occur and the project site is instead primarily comprised of disturbed habitat that is dominated by ruderal/weedy, low-growing plant species. Based on the records search conducted as part of the Biological Report, 12 special-status plant species and 39 special-status wildlife species have been recorded within the project study area (USGS Adelanto, Helendale, Victorville NW, and Victorville, California 7.5-minute quadrangles). There were no special-status vegetation communities reported within the project study area.

Special-Status Plants

No special-status plant species were observed within the project site during the field survey. It should be noted that two western Joshua trees were observed approximately 560 feet to the west of the northwest boundary of the project site, outside of the project limits. Based on the results of the field survey and a review of specific habitat preferences, distributions, and elevation ranges, the special-status plant species identified by the records search results are not expected to occur within the project site.

Special-Status Wildlife

One special-status wildlife species was observed within the project site during the field survey: California horned lark. In addition, two loggerhead shrikes were observed within the northern portion of the project site during a burrowing owl (BUOW) focused survey. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, it was determined that the project site has a moderate potential to support BUOW, and a low potential to support Cooper's hawk, Townsend's big-eared bat, and prairie falcon. All remaining special-status wildlife species identified by the records search are not expected to occur within the project site. Potential occurrences of BUOW and Mohave ground squirrel are described in further detail below:

- Burrowing Owl: The BUOW is currently listed as a CDFW Species of Special Concern. It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. BUOWs use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground. According to the CNDDB, there are twenty-five (25) occurrence records for BUOW within the USGS Adelanto and Victorville, California 7.5-minute quadrangles. There are no occurrence records for this species within the USGS Helendale and Victorville NW, California 7.5-minute quadrangles. BUOW focused surveys were conducted by Michael Baker qualified biologists on four (4) separate days during the 2021 breeding season. The BUOW focused surveys were conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG 2012) to document the presence/absence of BUOW on or within 500 feet of the project site. No BUOWs or BUOW sign (i.e., pellets, white wash, feathers, or prey remains) were observed during any of the four focused surveys. Suitable foraging habitat and line of site opportunities were observed throughout the project site, however, the project site lacked suitable burrows (> 4 inches in diameter) capable of providing roosting and nesting opportunities for BUOW. In addition, the soils located within the northern portions of the project site are heavily compacted and do not provide nesting/roosting opportunities for BUOW. In addition, the existing telephone poles, light posts, fencing, and industrial warehouse that occur within and adjacent to the project site further decrease the likelihood that BUOWs would occur as these features provide perching opportunities for larger raptor species (i.e., red-tailed hawk that prey on BUOWs).

- Mohave Ground Squirrel (MGS): The MGS is a State threatened species that is restricted to a small geographic area in the western Mojave Desert of California. According to the CNDDB, there are 11 occurrence records for MGS within the USGS Adelanto, Helendale, Victorville NW, and Victorville, California 7.5-minute quadrangles. ECORP Consulting, Inc. (ECORP), who holds a Memorandum of Understanding with CDFW for performing MGS studies, conducted a field survey of the project site on March 10, 2021 to determine the presence/absence of suitable habitat for MGS. Based on the results of the field survey, no MGS were observed or detected during the field survey and it was determined that suitable habitat for MGS does not occur within the project site. As such, MGS is not expected to occur within the project site and no further studies or consultation with CDFW under the California Endangered Species Act (CESA) would be required.

As noted above, the project could result in adverse effects to special-status animal species. Thus, Mitigation Measures BIO-1 through BIO-4 have been incorporated to reduce the potential impacts to these special-status wildlife species to less than significant.

Mitigation Measures:

BIO-1 Prior to initiating of ground disturbing activities for the project, a qualified biologist shall prepare and present a Workers Environmental Awareness Program (WEAP) training for all contractors, subcontractors, and workers expected to be on-site throughout the entire construction period. The WEAP shall include a brief review of any special-status species (e.g., California horned lark, loggerhead shrike, burrowing owl, western Joshua tree), including habitat requirements and where they might be found, and other sensitive biological resources that could occur in and adjacent to the project. The WEAP shall address the biological mitigation measures listed in the project's approved Mitigation Monitoring and Reporting Program, as well as applicable conditions and provisions of any associated environmental permits, including but not limited to pre-construction biological surveys, pre-construction installation of perimeter sediment and erosion control best management practices, and any recurrent nesting bird surveys. This requirement shall be indicated on project plans and specifications for verification by the City of Victorville.

BIO-2 If project-related activities are to be initiated during the nesting season (January 1st to August 31st), a pre-construction nesting bird clearance survey shall be conducted by a qualified biologist no more than three days prior to the start of any vegetation removal or ground disturbing activities. The qualified biologist shall survey all suitable nesting habitat within the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area. If no active nests are detected during the clearance survey, project activities may begin, and no additional avoidance and minimization measures would be required. If an active nest is found, the bird species shall be identified and a "no-disturbance" buffer shall be established around the active nest. The size of the "no-disturbance" buffer shall be increased or decreased based on the judgement of the qualified biologist and level of activity and sensitivity of the species. It is further recommended that the qualified biologist periodically monitor any active nests to determine if project-related activities occurring outside the "no-disturbance" buffer disturb the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-disturbance" buffer may occur following an additional survey by the qualified biologist to search for any new nests in the restricted area.

BIO-3 Two pre-construction clearance surveys shall be conducted 14 to 30 days and 24 hours prior to any vegetation removal or ground disturbing activities to confirm the presence/absence of burrowing owls and ensure impacts to any burrowing owls or occupied burrows do not occur. The clearance survey shall be conducted by a qualified biologist and cover all suitable habitat within the project impact area, including adjacent suitable habitat within a 500-foot buffer (as accessible). Following completion of the clearance survey, the qualified biologist shall prepare and submit a final report documenting the methods and results of the survey. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures would be required. If an occupied burrow is found within the project impact area during pre-construction clearance surveys, a burrowing owl exclusion plan shall be prepared and submitted to the California Department of Fish and Wildlife for approval prior to initiating project activities that includes proposed mitigation for direct and permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced. If an occupied burrow is found within adjacent habitat that may be indirectly impacted by project activities, the individual shall be buffered following the distances recommended by the project biologist. The biologist shall monitor the burrow, adjust the buffer area as needed, and shall have the authority to stop construction activities to prevent take.

BIO-4 Within 30 days prior to construction, a qualified bat biologist shall perform a clearance survey within all suitable structures within the project impact area. If bats roosts are found within the project impact area, the qualified bat biologist shall identify the bats to the species level and evaluate the colony to determine its size and significance. If any structures house an active maternity colony of bats, construction activities

shall not occur during the recognized bat breeding season (March 1 to October 1). Any proposed work in areas with no suitable roosting or foraging habitat shall not require a bat survey. If a bat roost is present within the vicinity of a proposed project impact area that does not need to be removed, a qualified bat biologist shall establish a species-specific no-disturbance buffer that must be maintained throughout the duration of the project. If a maternity roost is identified, a no-disturbance buffer shall be established and maintained until a qualified bat biologist determines that the roost is no longer active.

If project activities must occur during non-daylight hours or during the bat breeding season (March 1 to October 1), a qualified bat biologist shall establish monitoring measures, including frequency and duration, based on species, individual behavior, and type of construction activities. Night lighting shall be used only within the portion of the project actively being worked on and focused directly on the work area. This measure would minimize visual disturbance and allow bats to continue to utilize the remainder of the area for foraging and night roosting. If bats are showing signs of distress, work activities shall be modified to prevent bats from abandoning their roost or altering their feeding behavior. At any time, the qualified biologist shall have the authority to halt work if there are any signs of distress or disturbance that may lead to roost abandonment. Work shall not resume until corrective measures have been taken or it is determined that continued activity would not adversely affect roost success. Any roosting habitat loss shall be sequenced, and roosting habitat shall be restored or replaced in- kind and on-site to prevent temporal or permanent loss based on the bat species roosting requirements.

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

No Impact. The majority of the project site has been disturbed and no longer consists of native plant communities. The project footprint is generally a combination of bare, vegetated weedy ground, and developed land. Based on the Biological Report, no State or federal jurisdictional features (i.e., Waters of the United States (WoUS), wetlands, waters of the State, streambed) occur within the boundaries of the project site, and no special-status vegetation communities occur within the project study area. . Therefore, the project would not result in a significantly adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.04 (b). According to the Biological Report, there are no federally protected wetlands within the project site. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project site is surrounded by a mixture of urban and undeveloped land on all sides, including Adelanto Road, Gateway Drive, the Dr. Pepper/Snapple Facilities, and SCLA support facilities. Wildlife movement into or out of the project site would be reduced by the presence of surrounding roadways and activities associated with the SCLA. Movement of larger mammal wildlife within the northern portion of the project site is inhibited by the chain-link fence surrounding the SCLA which serves as a partial barrier. Although the southern portion of the project site (adjacent to Gateway Drive and Innovation Way) provides unrestricted passage opportunities for wildlife

movement, these areas are highly trafficked and wouldn't result in wildlife movement. Additionally, the open space areas to the north, south, and west of the project site, located outside of project boundaries, would continue to provide opportunities for local wildlife movement and function as a corridor for highly mobile wildlife species during project operations. As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The California Desert Native Plants Act protects certain species of California desert native plants from unlawful harvesting on both public and privately-owned lands. Section 88.01 of the San Bernardino County Development Code provides regulations and guidelines for the management of plant resources in the unincorporated areas of the County on property or combinations of property under private or public ownership. Chapter 13.33, Preservation and Removal of Joshua Trees, of the Municipal Code protects Joshua Trees, making it illegal for any person to cut, damage, destroy, dig up, or harvest any living Joshua tree without the prior written consent of the Director of Parks and Recreation or their designee.

No plant species that are protected under the California Desert Native Plants Act or Section 88.01 (Plant Protection and Management) of the County of San Bernardino Development Code were observed within the boundaries of the project site. Additionally, no Joshua trees are located within the project site. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. According to the California Department of Fish and Wildlife Service's *California Natural Community Conservation Plans Map* [1] the project site is not located within a Natural Community Conservation Plan (NCCP). Additionally, as indicated by in the Biological Report, the project site is not located within a Habitat Conservation Plan (HCP). Accordingly, there would be no impact in this regard.

Mitigation Measures: No mitigation is required.

[1] California Department Fish and Wildlife Services, *California Natural Community Conservation Plans*, April 2019.

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4.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?			✓	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?		✓		
d. Disturb any human remains, including those interred outside of formal cemeteries?		✓		

This section is based on the *Cultural Resources Identification Report for the Southern California Logistics Airport Lot 44 Warehouse Project, City of Victorville, San Bernardino County, California* (Cultural Resources Report) prepared by Michael Baker (dated April 9, 2021); refer to Appendix C, *Cultural Resources Report*.

a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?

Less Than Significant Impact. Based on the Cultural Resources Report, a records search of a one-mile search radius of the project site was conducted on March 23, 2021 at the South Central Coastal Information Center (SCCIC), a part of the California Historical Resources Information System (CHRIS), California State University, Fullerton. The CHRIS records search includes the California Inventory of Historic Resources, California Points of Historical Interest, California Historical Landmarks, Archaeological Determinations of Eligibility, and Built Environmental Resource Database (BERD) which includes the National Register of Historic Places (NRHP), National Historic Landmarks, California Register of Historic Resources (CRHR), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI) for San Bernardino County. The records search also included a review of literature and historical map, and an archaeological field survey.

According to the Cultural Resources Report, 30 previously conducted cultural resource studies have been completed within the one-mile search radius of the project site, five of which have been completed within the project site. The Cultural Resources Report noted that the entire project site has been previously surveyed except for a small portion at the southern end of Gateway Drive near the intersection with Air Expressway.

According to the Cultural Resources Report, 23 cultural resources are located within the one-mile search radius from the project site, two of which are located within the project site:

George Air Force Base (P-36-025787/CA-SBR-016313H). The air force base was recorded in 2012. The recordation identifies the resources boundaries and provides a brief history. It has not been evaluated for inclusion in the NRHP, CRHR, or local register of historical resources. Therefore, impacts to this resource would not be significant.

Facility 811 (P-36-015466). Facility 811, located on an abandoned runway on the former George Air Force Base, was constructed in 1954. It is a reinforced concrete and timber structure that measures 40 feet in height, 40 feet 4 inches in width, and 58 feet 10 inches in length. The interior and southeast façade displays timber cladding and an open bay filled with an earthen mound. The earthen mound was intended contain live ammunition fire from military aircraft. The structure displays an external structural concrete support system. Originally, the structure had two 100-foot timber wing walls and a massive surrounding earthen abutment necessary for its use as a firing wall. In 2010, the wing walls and earthen abutment were removed. In 1991, preempting the closure of George Air Force Base, Facility 811 was evaluated and recommended eligible for the NRHP under Criterion Consideration G for exceptional significance and

ultimately determined ineligible for the NRHP. It was subsequently listed in OHP's BERD with a 6Y status (ineligible for the NRHP, not evaluated for State or local significance).

Facility 811 has not been reevaluated since reaching 50 years of age. As such, Michael Baker evaluated it for inclusion in the CRHR as part of the Cultural Resources Report. The Cultural Resources Report noted that Facility 811 maintains integrity of location and setting, but lacks integrity of design, materials, workmanship, feeling, and association because it no longer displays the important features (earthen abutment and timber wing walls) that would justify its inclusion in the CRHR. The structure, therefore, lacks integrity. The Cultural Resources Report concluded Facility 811 is not eligible for listing in the California Register under any criteria due to lack of integrity. The structure was evaluated in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and it is not a historical resource as defined by CEQA Section 15064.5(a). Therefore, impacts to this resource would not be significant.

Additionally, an intensive field survey of the project site was conducted on March 18 to 19, 2021. It is noted project site has been heavily disturbed through disking, tilling and other ground disturbing activities. It is noted that no native soils or archaeological resources were observed.

Overall, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 and no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. Based on the records search and the intensive field survey conducted for the Cultural Resources Report, no archaeological resources were identified in the project site. However, due to existing disturbance at the project site, the project has a low potential to disturb archaeological resources. Nonetheless, there is a potential for disturbing previously unknown archaeological resources during excavation into native soil materials. As such, Mitigation Measure CUL-1 is recommended, which would include provisions to minimize impacts to cultural resources if they are encountered during ground disturbing activities. Upon implementation of Mitigation Measure CUL-1, impacts in this regard would be less than significant.

Mitigation Measures:

CUL-1 If archaeological resources are encountered during ground-disturbing activities, work in the immediate area (a minimum 60-foot buffer) shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. Work on other portions of the project site outside of the buffered area may continue during this assessment period. Additionally, in the event any pre-contact and/or historic-era finds are discovered, the City of Victorville shall consult with applicable tribes (including the San Manuel Band of Mission Indians) and provide the tribe(s) with information after the archaeologist makes their initial assessment of the nature of the find, so as to provide tribal input with regards to significance and treatment. If significant pre-contact and/or historic-era cultural resources are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to the tribe(s) for review and comment. The archaeologist shall monitor the remainder of the project and implement the Monitoring and Treatment Plan accordingly. The Monitoring and Treatment Plan shall allow for a monitor to be present that represents the applicable tribe(s) for the remainder of ground disturbing activities, should the tribe(s) elect to place a monitor on-site.

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

Less Than Significant Impact With Mitigation Incorporated. No conditions exist that suggest human remains are likely to be found on the project site. Due to the level of past disturbance on-site, it is not anticipated that human remains, including those interred outside of dedicated cemeteries, would be encountered during earth removal or disturbance activities. However, in the unlikely event human remains are encountered, Mitigation Measure CUL-2 would be implemented. If human remains or funerary objects are found, work in the immediate area would cease and those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5-7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with Mitigation Measure CUL-2 and existing State regulations, which detail the appropriate actions necessary in the event human remains are encountered, impacts in this regard would be considered less than significant.

Mitigation Measures:

CUL-2 If human remains or funerary objects 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 for the duration of the project.

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4.6 ENERGY

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

REGULATORY AND PLANNING FRAMEWORK

The following is a description of State and local regulations and planning programs related to energy consumption that are relevant to the proposed project.

State

Senate Bill 100. Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, 60 percent by December 31, 2030, and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and all other State agencies to incorporate that policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and other State agencies to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of the policy.

California Building Energy Efficiency Standards (Title 24). The 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings will use about 30 percent less energy, mainly due to lighting upgrades, when compared to 2016 Title 24 standards.[1] The standards offer developers better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen). California Green Building Standards (CALGreen) is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green building standards in an effort to meet the goals of California's landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHGs) to 1990 levels by 2020. CALGreen was developed to (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. The 2019 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2020. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g.,

[1] California Energy Commission, *2019 Building Energy Efficiency* Standards, dated March 2018.

lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[2]

California Public Utilities Commission Energy Efficiency Strategic Plan. The CPUC prepared an Energy Efficiency Strategic Plan (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and a reduction in GHGs. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the State between 2009 and 2020, and beyond 2020. The Strategic Plan contains the practical strategies and actions to attain significant statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the following four strategies:

1. All new residential construction in California will be zero net energy by 2020.

2. All new commercial construction in California will be zero net energy by 2030.

3. HVAC will be transformed to ensure that its energy performance is optimal for California's climate.

4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report. In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the *2020 Integrated Energy Policy Report Update* (2020 IEPR Update) Volume I and Volume III on March 17, 2021 , and Volume II on April 14, 2021.[3] The 2020 IEPR Update provides the results of the CEC's assessments of a variety of energy issues facing California, many of which will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs.[4] The year of 2020 was unprecedented as the State continues to face the impacts and repercussions of several events including the COVID-19 pandemic, electricity outages, and statewide wildfires. In response to these challenging events, the 2020 IEPR Update covers a broad range of topics, including transportation, microgrids, and the California Energy Demand Forecast. Volume I of the 2020 IEPR Update focuses on California's transportation future and the transition to zero-emission vehicles (ZEVs), Volume II examines microgrids, lessons learned from a decade of State-supported research, and stakeholder feedback on the potential of microgrids to contribute to a clean and resilient energy system, and Volume III reports on California's energy demand outlook, updated to reflect the global pandemic and help plan for a growth in zero-emission plug in electric vehicles.[5] Overall, the 2020 IEPR Update identifies actions the State and

[2] U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed April 27, 2021.

[3] California Energy Commission, *2020 Integrated Energy Policy Report Update Schedule*, March 25, 2021, https://www.energy.ca.gov/sites/default/files/2021-03/Workshop%20Schedule%20for%20Web%203.25.21_Updated_ADA.pdf, accessed April 27, 2021.

[4] California Energy Commission, *Final 2020 Integrated Energy Policy Report Update, Volume I: Blue Skies, Clean Transportation*, March 2021, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update-0, accessed April 27, 2021.

[5] Ibid.

others can take that would strengthen energy resiliency, reduce GHG emissions that cause climate change, improve air quality, and contribute to a more equitable future.

Executive Order N-79-20. Executive Order N-79-20, issued September 23, 2020, directs the State to require all new cars and passenger trucks sold in the State to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the State will be zero-emission by 2045.

City of Victorville

Victorville General Plan 2030

City policies and implementation measures pertaining to energy are contained in the Resource Element of the *Victorville General Plan* 2030 (General Plan). These policies and implementation measures include the following:

- **Policy 7.2.1**: Support energy conservation by requiring sustainable building design and development for new residential, commercial and industrial projects.

  Implementation Measure 7.2.1.1: Incorporate green building principles and practices, to the extent practicable and financially feasible, into the design, development and operation of all City owned facilities.

  Implementation Measure 7.2.1.2: Minimize energy use of new residential, commercial and industrial projects by requiring high efficiency heating, lighting and other appliances, such as cooking equipment, refrigerators, furnaces, overhead and area lighting, and low NO_x water heaters.

  Implementation Measure 7.2.1.3: Require drought tolerant landscaping in all new private developments.

METHODOLOGY

The impact analysis focuses on the three sources of energy that are relevant to the proposed project: electricity, natural gas, and transportation fuel for vehicle trips associated with the project as well as the fuel necessary for project construction. The analysis of electricity/natural gas usage is based on CalEEMod version 2016.3.2 GHG emissions modeling, which quantifies energy use for occupancy. The project's estimated electricity and natural gas consumption is based primarily on CalEEMod's default settings for San Bernardino County, and consumption factors provided by Victorville Municipal Utility Services (VMUS), the electricity and natural gas provider for the project.[6] The results of the CalEEMod modeling are included in Appendix A, *Air Quality/Greenhouse Gas/Energy/Health Risk Data*. The amount of operational fuel use was estimated using the EMFAC2017 computer program, which provides projections for typical daily fuel (i.e. diesel and gasoline) usage in the County, and the project's trip generation from the *SCLA Lot 44 Proposed Non-Sort Facility ITE Trip Generation Table* (Trip Generation Table) prepared by Michael Baker International (March 2021). The estimated construction fuel consumption is based on the project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The results of EMFAC2017 modeling and construction fuel estimates are included in Appendix A.

[6] According to the Michael Baker International, *Southern California Logistics Airport (SCLA) Specific Plan Amendment (PLAN19-0004), Subsequent Program Environmental Impact Report Public Review Draft*, dated December 2020, VMUS obtains electrical power for distribution in project area from a Southern California Edison (SCE) feed point. As such, SCE's consumption factors were used for the estimated electricity consumption.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis on Response 4.6(a) relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- Criterion 1: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- Criterion 2: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- Criterion 3: The effects of the project on peak and base period demands for electricity and other forms of energy.
- Criterion 4: The degree to which the project complies with existing energy standards.
- Criterion 5: The effects of the project on energy resources.
- Criterion 6: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses Criterion 1. The discussion on construction-related energy use focuses on Criteria 2, 4, and 5. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses Criteria 2, 3, and 6, and the building energy demand analysis discusses Criteria 2, 3, 4, and 5.

IMPACT ANALYSIS

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

Less Than Significant Impact. The project's estimated energy consumption is summarized in Table 4.6-1, *Project and Countywide Energy Consumption*. As shown in Table 4.6-1, the project's energy usage would constitute an approximate 0.0198 percent increase over San Bernardino County's typical annual electricity consumption and an approximate 0.0028 percent increase over the County's typical annual natural gas consumption. The project's construction and operational vehicle fuel consumption would increase the County's consumption by 0.0903 percent and 0.0454 percent, respectively (Criterion 1).

Table 4.6-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption[1]	San Bernardino County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	2,970 MWh	14,987,210 MWh	0.0198%
Natural Gas Consumption	15,448 therms	547,272,263 therms	0.0028%
Fuel Consumption			
Construction Fuel Consumption[3]	198,423 gallons	219,824,796 gallons	0.0903%
Operational Automotive Fuel Consumption[3]	424,262 gallons	934,230,342 gallons	0.0454%

Notes:
1. As modeled in CalEEMod version 2016.3.2.
2. The project increases in electricity and natural gas consumption are compared to the total consumption in San Bernardino County in 2019. The project increases in fuel consumption are compared with the projected Countywide fuel consumption in 2022.
   San Bernardino County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed April 21, 2021.
   San Bernardino County natural gas consumption data source: California Energy Commission, *Gas Consumption by County*, http://www.ecdms.energy.ca.gov/gasbycounty.aspx, accessed April 21, 2021.
3. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2017 model.

Refer to Appendix A, for assumptions used in this analysis.

Construction-Related Energy

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during grading, building construction, paving, and architectural coating. As indicated in Table 4.6-1, the overall fuel consumption during project construction would be 198,423 gallons, which would result in a nominal increase (0.0.0903 percent) in fuel use in the County. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (Criterion 2).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off (i.e. Title 13, California Code of Regulations Section 2485). Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (Criterion 4).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials.[7] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment, or building materials, or methods that would

[7] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed April 27, 2021.

be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (Criterion 5) and a less than significant impact would occur in this regard.

Operational Energy

Transportation Energy Demand

Pursuant to the federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Table 4.6-1 provides an estimate of the daily fuel consumed by vehicles traveling to and from the project site. As indicated in Table 4.6-1, project operations are estimated to consume approximately 424,262 gallons of fuel per year, which would increase Countywide automotive fuel consumption by 0.0454 percent. The project does not propose any unusual features that would result in excessive long-term operational fuel consumption (Criterion 2).

The key drivers of transportation-related fuel consumption for the proposed project are heavy-duty trucks traveling to and from the project site. Additionally, passenger vehicle and light- and medium-duty trucks trips also account for a portion of the transportation-related fuel consumption. At the time of this analysis, it has not been determined if the ultimate tenant would operate its own fleet and most warehouse operators have no control over the trucks entering and exiting their facilities. Consequently, it is infeasible to require trucks with particular emission profiles (e.g., zero-emission [ZE], near-zero-emission [NZE], or 2010 or beyond model year trucks) to visit the project site. Notwithstanding, the project's fleet vehicles would comply with State fuel efficiency standards and the project would employ zero idling policy (with the policy's notice posted on the inbound guard shack and noted when each driver checks in at the yard). Additionally, the project would include electric vehicle (EV) charging stations for trucks, which would further reduce fuel consumption.

The project would also consume fuel in the form of employees driving to and from the project site. However, employee commuting factors are outside of the scope of the design of the proposed industrial development. Notwithstanding, the project would include the installation of EV and vanpool/carpool stalls for passenger vehicles, as well as bicycle parking, in compliance with CALGreen Code. This requirement would encourage and support alternative modes of travel and thus reduce the petroleum fuel consumption (Criterion 4 and Criterion 6).

Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact would occur in this regard.

Building Energy Demand

The CEC developed 2018 to 2030 forecasts for energy consumption and peak demand in support of the 2017 IEPR for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections.[8] CEC forecasts that the statewide annual average growth rates of energy demand between 2016 and 2030 would be 0.99 percent to 1.59 percent for electricity and 0.25 percent to 0.77 percent for natural gas.[9] As shown in Table 4.6-1, operational energy consumption of the project would represent approximately 0.0198 percent increase in electricity consumption and 0.0028 percent increase in natural gas consumption over the current Countywide usage, which would be significantly below CEC's forecasts and the current Countywide usage. Therefore,

[8] California Energy Commission, *California Energy Demand 2018-2030 Revised Forecast*, February 2018. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Table 1 and Table 3, respectively.
[9] Ibid.

the project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (Criterion 2). Additionally, the project would consume energy during the same time periods as other light industrial developments and would consume energy evenly throughout the day. As a result, the project would not result in unique or more intensive peak or base period electricity demand (Criterion 3).

The proposed project would be required to comply with 2019 Title 24, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2019 Title 24 standards significantly reduces energy usage (30 percent for nonresidential uses compared to the 2016 standards). The Title 24 Building Energy Efficiency Standards are updated every 3-year and become more stringent between each update, as such complying with the latest 2019 Title 24 standards would make the proposed project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards. Compliance with 2019 Title 24 standards would also ensure the project would be consistent with General Plan Policy 7.2.1, by incorporating sustainable building design features and drought-tolerant landscape (Criterion 4).

The electricity provider, VMUS, is subject to California's Renewables Portfolio Standard (RPS) reflected in SB 100.[10] The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by the end of 2020, 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects will not result in the waste of the finite energy resources (Criterion 5).

The project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur.

Mitigation Measures: No mitigation is required.

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

Less than Significant Impact. The City currently does not have a plan pertaining to renewable energy or energy efficiency. The applicable State plans and policies for renewable energy and energy efficiency include the 2019 Title 24 standards, 2019 CALGreen Code, CPUC's Energy Efficiency Strategic Plan, and CEC's 2019 IEPR. The project would be required to comply with the latest Title 24 and CALGreen standards pertaining to building energy efficiency. Compliance with 2019 Title 24 standards and 2019 CALGreen Code would ensure the project incorporates energy-efficient building features as well as water-efficient fixtures and EV charging infrastructure, all of which consistent with the Energy Efficiency Strategic Plan strategies, the IEPR building energy efficiency recommendations, and General Plan Policy 7.2.1. Further, per the RPS, the project would utilize electricity provided by VMUS that would achieve at least 60 percent renewable energy by 2030. As such, the proposed project would be consistently associated with renewable energy or energy efficiency plans and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

[10] City of Victorville, *Renewable Portfolio Standard (RPS) Procurement Plan*, https://www.victorvilleca.gov/government/city-departments/utilities/electric/vmus-electric/rps-procurement, accessed April 27, 2021.

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4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) 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.			✓	
2) Strong seismic ground shaking?			✓	
3) Seismic-related ground failure, including liquefaction?				✓
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

This section is generally based on the *Draft Geotechnical Investigation Report, ARS Fulfillment Center, Victorville, California t* (Geotechnical Report) prepared by Langan Engineering and Environmental Services, Inc., dated April 9, 2021; refer to Appendix D, *Geotechnical Report*.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

1) 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.

Less Than Significant Impact. Southern California, including the project area, is subject to the effects of seismic activity due to the active faults that traverse the region. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone.

The City of Victorville is not located within an Alquist-Priolo Earthquake Fault Zone and the possibility of significant fault rupture on the project site is low. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

2) Strong seismic ground shaking?

Less Than Significant Impact. Southern California has numerous active seismic faults subjecting residents to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for residents and structures, categorized either as primary or secondary hazards. Primary hazards include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Primary hazards can also induce secondary hazards such as ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires. Both primary and secondary hazards pose a threat to the community as a result of the project's proximity to active regional faults.

Faults that are most likely to impact the City as a result of seismic activity include the Mirage Valley Fault Zone and the Helendale-South Lockhart Fault Zone. According to the Geotechnical Report, the Mirage Valley fault is the closest major fault to the project site, which is located approximately 7.8 miles northwest of the project site and the Helendale-South Lockhart fault is located approximately 12 miles northeast of the site. Both faults are capable of producing strong seismic ground shaking within the project site. Therefore, the proposed project is anticipated to experience moderate to occasionally high levels of ground motion from nearby faults as well as ground motions from other active seismic areas of the southern California region.

Impacts concerning strong seismic ground shaking would be addressed by compliance with the seismic design requirements identified in the 2019 CBC. Pursuant to the 2019 CBC and Municipal Code Section 16-5.01.020, structures built for human occupancy must be designed to meet or exceed the 2019 CBC standards for earthquake resistance. The 2019 CBC includes earthquake safety standards based on a variety of factors including occupancy type, types of soils and rocks on-site, and strength of probable ground motion at the project site. Further, it is the City's policy that preliminary geotechnical investigations and reports are conducted for all new public and private development and major redevelopment projects, to identify seismic and other geologic hazards, and to define measures to eliminate or reduce such hazards to an acceptable level (Victorville General Plan Policy 3.2.2, Implementation Measure 3.2.2.1). Compliance with the 2019 CBC, as adopted by reference in Municipal Code 16-5.01.020, and the General Plan Policy 3.2.2, Implementation Measure 3.2.2.1 would reduce impacts related to strong seismic ground shaking to less than significant levels.

3) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Liquefaction is characterized by a loss of shear strength in the affected soil layers, thereby causing the soils to behave as a viscous liquid. Susceptibility to liquefaction is based on geologic and geotechnical data. River channels and floodplains are considered most susceptible to liquefaction, while alluvial fans have a lower susceptibility. Depth to groundwater is another important element in the susceptibility to liquefaction. Groundwater shallower than 30 feet results in high to very high susceptibility to liquefaction, while deeper water results in low and very low susceptibility.

According to the Geotechnical Report, the project is not indicated by the County of San Bernardino as an area that is subject to liquefaction. Site investigations did not encounter groundwater at the maximum depth explored (approximately 21.5 feet). Additionally, a review of the California Department of Water Resources Water Data Library web tool several wells in the vicinity of the site indicate that groundwater is in excess of 75 feet below ground surface (bgs). As such, the potential for liquefaction and seismic-related ground failure is considered very low. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

4) Landslides?

No Impact. According to the Geotechnical Report, the project site is not located within a zone of landslide susceptibility. Additionally, no landslides have been mapped near the site on regional geologic maps of the area. Evidence of deep-

seated land sliding have not been observed and no significant sloped boundary conditions exist. As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less than Significant Impact. Project operations are not expected to result in substantial erosion or loss of topsoil to the project area. The primary concern in regard to soil erosion or loss of topsoil would be during the construction phase of the project. Grading and earthwork activities associated with project construction activities would expose soils to potential short-term erosion by wind and water. All demolition and construction activities for the project would be subject to compliance with the CBC. Further, the project would be subject to compliance with the requirements set forth in the National Pollutant Discharge Elimination System (NPDES) Storm Water General Construction Permit for construction activities. The NPDES Storm Water General Construction Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP), which would identify specific erosion and sediment control Best Management Practices (BMPs) that would be implemented to protect storm water runoff during construction activities. Compliance with the CBC and NPDES requirements would minimize effects from erosion and ensure consistency with the RWQCB Water Quality Control Plan. Following compliance with Municipal Code, CBC, and NPDES requirements, project implementation would result in a less than significant impact regarding soil erosion.

Mitigation Measures: No mitigation is required.

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 an on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. Impacts related to landslides are analyzed in Response 4.7(a)(4); impacts pertaining to liquefaction are analyzed in Response 4.7(a)(3).

According to the Geotechnical Report, lateral spreading is seismically-induced slope instability phenomenon wherein slope failure can occur as a result of liquefaction. The potential for liquefaction at the site is considered to be very low and significant (in height) open-slope face conditions are neither existing nor planned. Thus, the potential for lateral spreading is considered negligible.

Based on the Geotechnical Report, land subsidence may be induced from withdrawal of oil, gas, or water from wells. Based on a search of the CalGEM (formerly known as Division of Oil, Gas, and Geothermal Resources [DOGGR]) GIS Well Finder online tool, there are no wells within a mile of the site. Thus, the likelihood of land subsidence is very low. As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking (when dry) or swelling (when wet). According to the Geotechnical Report, based on the field exploration near-surface soils are generally granular and the expansion potential is anticipated to be in the very low to low categories Thus, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. No septic tanks or alternative wastewater disposal systems would be constructed as part of the project. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. Based on the *Paleontological Resource Assessment for the Southern California Logistics Airport Specific Plan Amendment* prepared by Applied Works (dated June 2019), the project site is mapped at the ground surface as Holocene-age deposits (Qa, Qf, Qyf) and artificial fill that were assigned a ranking of low potential for paleontological sensitivity. However, high potential deposits, such as Pleistocene-age or older (Qoa, Qoam), are likely present below the surficial Holocene-age deposits and artificial fill at unknown depths within the project site. To minimize impacts in this regard, Mitigation Measure GEO-1 has been incorporated, which includes a requirement for a paleontological resource mitigation and monitoring program (PRMMP), which would include procedures for construction monitoring and a protocol for fossil discoveries and the subsequent treatment of fossils. With the implementation of Mitigation Measure GEO-1, impacts would be reduced to a less than significant level.

Mitigation Measures:

GEO-1 The proposed project shall include the following provisions in order to minimize impacts related to paleontological resources:

- A paleontological resources mitigation and monitoring plan (PRMMP) shall be prepared by a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for a Principal Investigator or Project Paleontologist. The qualified paleontologist shall submit a letter of retention to the project proponent no fewer than 15 days before any grading or excavation activities commence. The letter shall include a resume for the qualified paleontologist that demonstrates fulfillment of the SVP standards. The PRMMP shall be prepared before any grading activities begin. The PRMMP shall address mitigation and monitoring specific to the project site and construction plan, which may include one or more of the following: construction worker training, monitoring protocols, protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate, fossil salvage and data collection protocols in the event of an unanticipated discovery, curation facilities for any significant fossils that may be salvaged, and a final report summarizing the results of the program. The PRMMP shall consider updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. The PRMMP shall adhere to and incorporate the performance standards and practices from the current SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. The qualified paleontologist shall submit the final PRMMP to the City of Victorville Development Department for review and approval before issuance of a grading permit.

- The project shall incorporate worker training prior to any ground-disturbing activity to ensure construction workers are aware that while paleontological sensitivity is low, fossils may still be encountered. A qualified paleontologist, as defined above, shall be appointed to oversee the training, remain on-call in the event fossils are found, and have the authority to divert activity should fossils be found on-site.

- If found, recovered fossils shall be prepared to the point of curation, identified by a qualified paleontologist, as defined above, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.

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4.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Global Climate Change

California is a substantial contributor of global GHGs, emitting over 425 million metric tons of carbon dioxide equivalent ($MTCO_2e$) per year.[1] Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which increases the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of carbon dioxide (CO_2), CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of April 2021, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 417 ppm.[2]

Regulatory Framework

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent (CO_2e)[3] concentration is required to keep global mean warming below two degrees Celsius (^oC), which in turn is assumed to be necessary to avoid dangerous climate change.

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

[1] California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2018,* https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2018/ghg_inventory_trends_00-18.pdf, accessed April 26, 2021.

[2] Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed April 26, 2021.

[3] Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Executive Order N-79-20. Executive Order N-79-20, issued September 23, 2020, directs the State to require all new cars and passenger trucks sold in the State to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the State will be zero-emission by 2045.

Senate Bill 32. Signed into law on September 2016, SB 32 codifies California's 2030 GHG reduction target of 40 percent below 1990 levels by 2030. The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

California Building Energy Efficiency Standards (Title 24). In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under the 2019 Title 24 standards, nonresidential buildings would use about 30 percent less energy (mainly due to lighting upgrades) when compared to 2016 Title 24 standards.[4] The standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

CARB Scoping Plan. On December 11, 2008, California Ari Resources Board (CARB) adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California implement; to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million $MTCO_2e$ under a business as usual (BAU)[5] scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The 2014 Scoping Plan identifies the actions California had already taken to reduce GHG emissions and focused on areas where further reductions could be achieved to help meet the 2020 target

[4] California Energy Commission, *2019 Building Energy Efficiency Standards*, dated March 2018.
[5] "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

established by AB 32. The 2014 Scoping Plan update also looked beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observed that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal."

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan). This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the updated 2017 Scoping Plan draws on a decade of successful programs that address the major sources of climate changing gases in every sector of the economy.

Southern California Association of Governments. On September 3, 2020, the Regional Council of Southern California Association of Governments (SCAG) adopted *The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments – Connect SoCal* (2020–2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specifically, these strategies are:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the state-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

MDAQMD CEQA and Federal Conformity Guidelines. According to the Mojave Desert Air Quality Management District's (MDAQMD) *CEQA and Federal Conformity Guidelines*, a project is significant if it triggers or exceeds the most appropriate evaluation criteria. MDAQMD would clarify upon request which threshold is most appropriate for a given project; in general, for GHG emissions, the MDAQMD significance emission threshold of 100,000 $MTCO_2e$ per year 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.

Victorville General Plan 2030. City policies and implementation measures pertaining to GHG emissions are contained in the Resource Element of the *Victorville General Plan 2030* (General Plan). These policies and implementation measures include the following:

- **Policy 6.1.1**: Encourage planning and development activities, that reduce the number and length of single occupant automobile trips.

  Implementation Measure 6.1.1.1: Require large projects (exceeding 150,000 square feet of development) to incorporate Transportation Demand Management (TDM) techniques, such as promoting carpooling and transit, as a condition of project approval.

- **Policy 7.2.1**: Support energy conservation by requiring sustainable building design and development for new residential, commercial and industrial projects.

  Implementation Measure 7.2.1.2: Minimize energy use of new residential, commercial and industrial projects by requiring high efficiency heating, lighting and other appliances, such

as cooking equipment, refrigerators, furnaces, overhead and area lighting, and low NO_X water heaters.

Implementation Measure 7.2.1.3: Require drought tolerant landscaping in all new private developments.

Victorville Climate Action Plan. The City prepared its Climate Action Plan (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. The CAP allows developers to demonstrate that their projects are consistent with the CAP by demonstrating compliance with the Victorville Greenhouse Gas Emissions Screening Table review process. The Victorville Greenhouse Gas Emissions Screening Table review process allows developers to streamline CEQA review and bypass a complete GHG analysis on their own for CEQA processing. Emissions associated with projects that are consistent with the City's CAP are considered less than significant and their contributions to cumulative emissions are not considered cumulatively considerable. However, the City's CAP does not align with the Statewide goals beyond 2020 and thus the CAP is not consistent with the criteria within CEQA Guidelines Section 15183.5 for the post-2020 period. 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. As the proposed project would be constructed and operational post-2020, the 2015 CAP was not utilized for project consistency.

Victorville Greenhouse Gas Reduction Plan. To meet the intent of SB 32, the City is in the process of adopting the *City of Victorville 2021 Greenhouse Gas Reduction Plan* (GGRP) to implement General Plan policies focused on GHG emissions. The GGRP sets an aggressive goal to reduce GHG emissions by 55 percent below 2008 baseline GHG emission levels. In order to achieve this goal, the GGRP will require 100 percent of new industrial buildings to install on-site renewable electrical generation (i.e. photovoltaic [PV] solar panels).

Thresholds of Significance

The following thresholds of significance are based on CEQA Guidelines Appendix G. For the purposes of this analysis, implementation of the proposed project would be considered to have a significant impact on GHG emissions if it would do any of the following:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and the City's CAP would be inconsistent with the State's post-2020 GHG reduction goals. Lead agencies may elect to rely on thresholds of significance recommended or adopted by State or regional agencies with expertise in the field of global climate change (CEQA Guidelines Section 15064.7[c]). CEQA leaves the determination of significance to the reasonable discretion of the lead agency and encourages lead agencies to develop and publish thresholds of significance to use in determining the significance of environmental effects. Thus, the project's GHG emissions are compared to the adopted MDAQMD threshold of 100,000 MT CO_2e per year.

In addition, since the City's adopted CAP would not be consistent with the State's post-2020 GHG reduction goals, the GHG plan consistency for this project is based off the project's consistency with the City's General Plan, 2020-2045 RTP/SCS, and 2017 Scoping Plan Update. The 2020-2045 RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2020-2045 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2017 Scoping Plan Update describes the approach California will take to reduce GHG emissions by 40 percent below 1990 levels by the year 2030.

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

Less Than Significant Impact.

Project-Related Sources of Greenhouse Gases

The proposed project would result in direct and indirect emissions of CO_2, CH_4, and N_2O, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction and operational activities, while indirect sources include emissions from electricity consumption. The proposed project would include construction of a warehousing/distribution building. The CalEEMod version 2016.3.2 and CARB EMission FACtor Model (EMFAC2017) were utilized to calculate the project's construction and operational GHG emissions. The CalEEMod outputs are contained within the Appendix A, *Air Quality/Greenhouse Gas /Energy Data*. Table 4.8-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO_2, CH_4, and N_2O emissions of the proposed project.

Table 4.8-1
Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	
Direct Emissions						
• Construction (total of 3,483.62 $MTCO_2e$ amortized over 30 years)	115.90	0.01	0.22	<0.01	<0.01	116.12
• Area Source	0.02	<0.01	<0.01	<0.01	<0.01	0.02
• Mobile Source	3,345.38	0.11	2.72	<0.01	<0.01	3,348.10
Total Direct Emissions[3]	***3,461.30***	***0.12***	***2.94***	***<0.01***	***<0.01***	***3,464.24***
Indirect Emissions						
• Energy	772.87	<0.01	0.04	<0.01	0.45	773.36
• Solid Waste Generation	103.08	6.09	152.29	<0.01	<0.01	255.37
• Water Demand	696.57	6.51	162.81	0.15	45.83	905.20
Total Indirect Emissions[3]	***1,572.52***	***12.61***	***315.14***	***0.16***	***46.28***	***1,933.93***
Total Project-Related Emissions[3]	***5,398.17 $MTCO_2e$/year***					
GHG Emissions Threshold	***100,000 $MTCO_2e$/year***					
GHG Emissions Exceed Threshold?	***No***					

Notes:
1. Project emissions were calculated using CalEEMod version 2016.3.2 and EMFAC2017.
2. CO_2 Equivalent values calculated using the EPA Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed April 2021.
3. Totals may be slightly off due to rounding.
4. Emission reductions applied in the CalEEMod model include regulatory requirements such as compliance with the 2019 Title 24 Building Standards Code and the 2019 CALGreen Code. These mandatory regulatory requirements would include low flow plumbing fixtures, solid waste diversion, and electricity from renewable energy sources.

Refer to Appendix A, for detailed model input/output data.

Direct Project-Related Sources of Greenhouse Gases

- *Construction Emissions*. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.[6] As shown in Table 4.8-1, the proposed project would result in 116.12 $MTCO_2e$ per year (amortized over 30 years), which represents a total of 3,483.62 $MTCO_2e$ from construction activities.

- *Area Source*. Area source emissions would be generated due to an increased demand for natural gas associated with the development of the proposed project. The primary use of natural gas producing area source emissions by the project would be for consumer products, architectural coating, and landscaping. As noted in Table 4.8-1, the proposed project would result in 0.02 $MTCO_2e$ per year of area source GHG emissions.

- *Mobile Source*. The CalEEMod model relies upon trip data within the *SCLA Lot 44 Proposed Non-Sort Facility ITE Trip Generation Table* (Trip Generation Table) prepared by Michael Baker International (March 2021) and project-specific land use data to calculate mobile source emissions. According to the Trip Generation Table, the project would generate approximately 1,987 total daily trips, including 616 truck trips. The project fleet mixes and trip generation rates were applied in CalEEMod. The project would directly result in 3,348.10 $MTCO_2e$ per year of mobile source-generated GHG emissions; refer to Table 4.8-1.

Indirect Project-Related Source of Greenhouse Gases

- *Energy Consumption*. Electricity would be provided to the project site by Victorville Municipal Utilities Services (VMUS). However, VMUS obtains electrical power for distribution in the project area from a Southern California Edison (SCE) feed point. Therefore, energy consumption emissions were calculated using emission factors (pound per megawatt hour [lb/MWh]) from the SCE *2019 Sustainability Report* and CalEEMod; refer to Appendix A.[7] The project would indirectly result in 773.36 $MTCO_2e$ per year due to energy consumption; refer to Table 4.8-1.

- *Water Demand*. The project operations would result in a demand of approximately 200.91 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 905.20 $MTCO_2e$ per year; refer to Table 4.8-1.

- *Solid Waste*. Solid waste associated with operations of the proposed project would result in 255.37 $MTCO_2e$ per year; refer to Table 4.8-1.

Total Project-Related Sources of Greenhouse Gases

As shown in Table 4.8-1, the total amount of proposed project related GHG emissions from direct and indirect sources combined would total 5,398.17 $MTCO_2e$ per year, which is below the MDAQMD GHG threshold of 100,000 $MTCO_2e$ per year. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

[6] In accordance with the MDAQMD guidance, projected GHGs from construction have been quantified and amortized over 30 years, which is the number of years considered to represent the life of the project. The amortized construction emissions are added to the annual average operational emissions.

[7] Edison International, *Sustainability Report 2019*, https://www.edison.com/content/dam/eix/documents/sustainability/eix-2019-sustainability-report.pdf, accessed April 26, 2021.

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

Less Than Significant Impact.

While the City adopted a CAP in 2015, this CAP looked at consistency with AB 32 and the year 2020. The City is in the process of adopting the GGRP to meet the intent of SB 32, however the GGRP has not been formally adopted. Thus, the GHG plan consistency analysis for the project is based off the project's consistency with the City's General Plan, 2020-2045 RTP/SCS, and 2017 Scoping Plan Update to examine consistency beyond 2020. The 2020-2045 RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2020-2045 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2017 Scoping Plan Update describes the approach California will take to reduce GHG emissions by 40 percent below 1990 levels by the year 2030.

Project Consistency with the Victorville General Plan

The Resource Element of the City's General Plan has identified goals and policies aimed at GHG reduction in the City. As shown in Table 4.8-2, *Project Consistency with the Victorville General Plan*, the project would be consistent with the GHG reduction goals and objectives of the General Plan.

Table 4.8-2
Project Consistency with the Victorville General Plan

Goals and Policies	Project Consistency Analysis
Policy 6.1.1: Encourage planning and development activities, that reduce the number and length of single occupant automobile trips.	
Implementation Measure 6.1.1.1: Require large projects (exceeding 150,000 square feet of development) to incorporate Transportation Demand Management (TDM) techniques, such as promoting carpooling and transit, as a condition of project approval.	**Consistent.** The project would provide bicycle parking, electric charging stations, and vanpool/carpool parking spaces on-site, which would promote alternative transportation modes and reduce single occupant automobile trips.
Policy 7.2.1: Support energy conservation by requiring sustainable building design and development for new residential, commercial and industrial projects.	
Implementation Measure 7.2.1.2: Minimize energy use of new residential, commercial and industrial projects by requiring high efficiency heating, lighting and other appliances, such as cooking equipment, refrigerators, furnaces, overhead and area lighting, and low NO_X water heaters.	**Consistent.** The project would comply 2019 Title 24 Standards and 2019 CALGreen Code, which would include energy efficient heating, lighting, and appliances.
Implementation Measure 7.2.1.3: Require drought tolerant landscaping in all new private developments.	**Consistent.** The project would incorporate water efficient and drought tolerant landscaping on-site.
Source: City of Victorville, *Victorville General Plan*, adopted October 2008.	

Project Consistency with the SCAG 2020-2045 RTP/SCS

Table 4.8-3, *Project Consistency with the 2020-2045 RTP/SCS*, shows the project's consistency with the strategies found within the 2020-2045 RTP/SCS. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 4.8-3
Project Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** The project site is located adjacent to the Southern California Logistics Airport (SCLA) and is located approximately 6.8 miles of Victor Valley Transportation Center. In compliance with the CALGreen Code, the project's on-site parking spaces would consist of 6 percent of electric vehicle (EV) charging stations and 8 percent of vanpool/carpool parking spaces, which would promote alternative mobility options. Additionally, the project would promote healthy lifestyles by providing bicycle parking spaces for employees and visitors. As such, the project would be consistent with this reduction strategy.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**HQTA, TPAs, NMA, Livable Corridors.**	**Consistent.** The project would be required to comply with all applicable 2019 Title 24 Standards and CALGreen Code at the time of construction. These building codes require EV charging stations, designated EV parking, designated carpool and/or alternative-fueled vehicles, as well as bike parking and storage. Therefore, proposed development within the project would leverage technology innovations and help the City, County, and State meet its GHG reduction goals. The project would be consistent with this reduction strategy.

Table 4.8-3 (continued)
Project Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**PGA, Job Centers, HQTAs, TPA, NMAs, Livable Corridors, SOIs, Green Region, Urban Greening.**	**Consistent.** As described above, the project site is located adjacent to the SCLA and is located approximately 6.8 miles of Victor Valley Transportation Center. The project would implement sustainable design features in accordance with the 2019 Title 24 Standards and CALGreen Code. Sustainable design features include energy-efficient appliances, water and space heating/cooling equipment, building insulation and roofing, and lighting. Thus, the project would be consistent with this reduction strategy.

Table 4.8-3 (continued)
Project Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	**Green Region, Urban Greening, Greenbelts and Community Separators.**	**Consistent.** The proposed project would be required to comply with all applicable Title 24 and CALGreen measures, which would help reduce energy consumption and reduce GHG emissions. Thus, the project would support climate change resilience and local policies for efficient development that reduces energy consumption and GHG emissions. The project would be consistent with this reduction strategy. In addition, as noted within Section 4.6, *Energy*, the project would not result in significant impacts related to the wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation.
Source: Southern California Association of Governments, *2025-2040 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.		

Project Consistency with the 2017 Scoping Plan

The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. Some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve Statewide GHG emissions targets at an unknown time in the future. Table 4.8-4, *Consistency with the 2017 Scoping Plan*, provides an evaluation of applicable reduction actions/strategies by emissions source category to determine whether the project would be consistent with or exceed reduction actions/strategies outlined in the 2017 Scoping Plan.

Table 4.8-4
Consistency with the 2017 Scoping Plan

Actions and Strategies	Project Consistency Analysis
Senate Bill 350	
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	The project would utilize electricity delivered by VMUS, which is required to comply with SB 350. As such, it can be reasonably inferred that the project would be in compliance with SB 350.

Table 4.8-4 (continued)
Consistency with the 2017 Scoping Plan

Actions and Strategies	Project Consistency Analysis
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	Motor vehicles driven by the proposed project's employees and visitors would be required to use LCFS compliant fuels in accordance with Federal and State fuel standards that apply during project operations, thus the project would be in compliance with this strategy.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	
Maintain existing GHG standards of light and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	The project would include light and heavy-duty truck trips that would be required to comply with the applicable Mobile Source Strategy that applies during project operations, including all CARB and MDAQMD regulations. Additionally, the project would be required to comply with CALGreen and would include EV parking and charging stations. Furthermore, the State is expected to see a decrease in transportation sector GHG emissions due to Executive Order N-79-20. Executive Order N-79-20 directs the State to require all new vehicles sold in the State to be zero-emission by 2035 (cars and passenger trucks) and by 2045 (medium- and heavy-duty vehicles). As such, the project would not conflict with the goals of the Mobile Source Strategy.
Sustainable Freight Action Plan	
Improve the freight system efficiency and maximize the use of near zero emission vehicles and equipment powered by renewable energy. Deploy over 100,000 zero-emission trucks and equipment by 2030.	**Consistent.** As described above, truck uses associated with the project site would be required to comply with all CARB regulations, including the LCFS and newer engine standards. Additionally, the project would comply with all future applicable regulatory standard adopted by CARB and would not conflict with CARB's goal to deploy over 100,000 zero-emission trucks and equipment by 2030.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy	
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	**Consistent.** The project would not emit a large amount of CH_4 (methane) emissions; refer to Table 4.8-1. Furthermore, the project would comply with all CARB and MDAQMD hydrofluorocarbon regulations. As such, the proposed project would not conflict with the SLCP reduction strategy.
SB 375 Sustainable Communities Strategies	
Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO).	As shown in Table 4.8-3, the project would be consistent with the 2020-2045 RTP/SCS.
Post-2020 Cap and Trade Programs	
The Cap-and-Trade Program will reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals.	**Not Applicable.** As seen in Table 4.8-1, the project would generate approximately 5,398.17 $MTCO_2e$ per year, which is below the 25,000 $MTCO_2e$ per year Cap-and-Trade screening level. Therefore, the project would not conflict with this goal.
Source: California Air Resources Board, *2017 Scoping Plan*, November 2017.	

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the General Plan, 2020-2045 RTP/SCS, and 2017 Scoping Plan Update. Thus, the project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, project impacts with regard to climate change would

be less than significant and there would no conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Mitigation Measures: No mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		✓		
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		✓		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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?			✓	

This section is based on the *Environmental Site Investigation SBD4 Victorville, California* (ESI) prepared by Langan Engineering and Environmental Services, Inc. (dated April 27, 2021); refer to Appendix H, *ESI*.

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

Less Than Significant Impact With Mitigation Incorporated. The project proposes the construction of a distribution facility intended for industrial use. Long-term operation of the project may involve the routine transport, use, or disposal of small quantities of hazardous materials. Generally, the exposure of persons to hazardous materials could occur in the following manner: 1) improper handling or use of hazardous materials or hazardous wastes during construction or operation of future developments, particularly by untrained personnel; 2) an accident during transport; 3) environmentally unsound disposal methods; or 4) fire, explosion, or other emergencies. Therefore, the project could result in impacts related to the routine transport, use, and/or disposal of hazardous materials.

The proposed project would be subject to compliance with existing regulations, standards, and guidelines established by the U.S. EPA, State, County, and the City related to the storage, use, and disposal of hazardous materials. The project is subject to compliance with existing hazardous materials regulations, which are codified in California Code of Regulations Titles 8, 22, 26, and 49, as well as the enabling legislations set forth in Health and Safety Code Chapter 6.95. Both the federal and State governments require any business, where a maximum quantity of a regulated substance exceeds the specified threshold quantity, register with the County as a manager of regulated substances

and prepare a Risk Management Plan. The State's Accidental Release Prevention Law provides for consistency with federal laws (i.e., the Emergency Preparedness and Community Right-to-Know Act and the Clean Air Act) regarding accidental chemical releases and allows local oversight of both the State and federal programs. The Accidental Release Prevention Law is implemented by the Certified Unified Program Agencies (CUPAs), in this case, the City of Victorville Fire Department. The Victorville Fire Department administers and enforces the California Accidental Release Prevention (CalARP) program. The CalARP program encompasses both the federal "Risk Management Program," established in the Code of Federal Regulations, Title 40, Part 68, and the State of California program, in accordance with the California Health and Safety Code, Chapter 6.95, Article 2 and California Code of Regulations, Title 19, Division 2, Chapter 4.5. The Risk Management Plan must contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. Businesses would be required to submit their plans to the Certified Unified Program Agency (CUPA) (City of Victorville Fire Department), which would make the plans available to emergency response personnel. The Risk Management Plan must identify the type of business, location, emergency contacts, emergency procedures, mitigation plans, and chemical inventory at each location. With adherence to existing standards pertaining to long-term operations, impacts would be less than significant.

The project could also result in impacts during the short-term construction process. While the risk of exposure to hazardous materials cannot be eliminated, best management practices can be implemented to reduce risk to acceptable levels. Additionally, in the unlikely event that unknown hazardous materials are uncovered during future construction activities, Mitigation Measure HAZ-1 would ensure work in the suspected contaminant's vicinity is immediately halted until a Hazardous Waste/Materials Coordinator advises the responsible party of further action to be taken, if required. Implementation of Mitigation Measure HAZ-1 and adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials, and the safety procedures mandated by applicable federal, State, and local laws and regulations, which would ensure that risks resulting from the routine transportation, use, storage, or disposal of hazardous materials or hazardous wastes associated with implementation of the proposed project would be less than significant. In addition, given the site's previous association with operation of the former George Air Force Base, Mitigation Measure HAZ-2 would be implemented. This measure would require a munitions and explosives safety briefing for construction workers to describe actions to be taken in the event any suspect materials are discovered during ground disturbing activities. With incorporation of Mitigation Measures HAZ-1 and HAZ-2, impacts during the construction process would be less than significant.

Mitigation Measures:

HAZ-1 If the construction contractor discovers unknown wastes or suspect materials during construction that are believed to involve hazardous waste or materials, the construction contractor shall:

- Immediately cease work in the suspected contaminant's vicinity, and remove workers and the public from the area;
- Notify the City of Victorville Development Department;
- Secure the area as directed by the City of Victorville Development Department; and
- Notify the implementing agency's Hazardous Waste/Materials Coordinator.

A Hazardous Waste/Materials Coordinator shall be appointed by the City and shall advise the responsible party of further actions that shall be taken, if required.

HAZ-2 Construction supervisors and crews shall attend an applicant-sponsored munitions and explosives safety briefing prior to commencement of construction. This briefing shall identify the variety of munitions and explosives that are known to exist on the former George Air Force Base and the actions to be taken if a suspicious item is discovered. This requirement for briefing shall be included in construction documents, approved by the City of Victorville City Engineer.

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

Less Than Significant Impact.

Short-Term Impacts

One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, hazardous substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure of contaminated soil, soil gas, or water can have potential health effects depending on a variety of factors, including the nature of the contaminant and the degree of exposure.

Construction Equipment

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law including the Hazardous Waste Control Act, California Division of Occupational Safety and Health (Cal/OSHA) requirements, Resources Conservation and Recovery Act (RCRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA). Compliance with existing laws and regulations would ensure impacts in this regard would be less than significant.

Existing Hazardous Materials

Based on the ESI prepared for the proposed project, two environmental investigation sites/areas of the former George Air Force Base (GAFB) are within the project site footprint: Site ZZ050 and a portion of Site SD018. Both are listed as "OU-3 Soil Sites" and were closed during the 1990s with a No Further Action designation by the United States Air Force (USAF) and United States Environmental Protection Agency (EPA). The ZZ050 site was reportedly used for aircraft radar siting and ammunition (shooting) target practice. The ESI reported a third GAFB site (ZZ051) located approximately 300 feet southeast of the project site. This site was reported as an "engine test cell" area that included several USTs with historical releases of jet fuel to the subsurface. Remediation was implemented by the USAF, including bioventing and the operation of soil vapor extraction (SVE) systems, with the SVE system operated 2000 through 2015. A site closure request is reportedly in the process for the ZZ051 site, but a formal closure has not yet been granted.

Geophysical Survey

A geophysical survey was conducted and as part of evaluation activities for the ESI. The survey work consisted of generalized scanning at the Z0050 site, the former revetment area, and at the former runway areas. Results of the survey did not detect any major material anomalies at the former revetment and runway areas. One minor anomaly was detected northwest of the ZZ050 site; based on the nature of the data received, it was inferred by the ESI that the subsurface includes rocks or concrete debris. No anomalies suggestive of rebar, piping, or underground structures were detected in the surveys. Therefore, impacts related to hazardous materials as a result of former site structures and historic activities are anticipated to be less than significant.

Soil Investigation

As part of the ESI, a total of 25 shallow composite soil samples were collected at 13 locations on-site. Additionally, 14 soil samples were collected from 7 soil borings located in various areas of the project site, including the ZZ050 site. The soil borings reached depths of up to 20 feet. Analytical lab reports of the samples found the following:

- Volitale Organic Compounds (VOCs) were not detected above reporting limits in any of the soil samples.
- SVOCs were detected within three soil samples. However, none of the detections exceeded federal and state screening levels.
- Petroleum hydrocarbons were detected in the diesel range for one soil sample at 200 milligrams per kilogram (mg/kg) but did not exceed federal and state screening levels.
- Metals were detected within all but nine of the soil samples. Of the metals detected, only arsenic was detected above applicable screening levels. However, the highest concentration of arsenic detected was 6.3 mg/kg, which is below the generally accepted background level of 12 mg/kg in Southern California.

Based on the analytical lab results, soil concentrations are not anticipated to prohibit industrial use within the project site, and impacts in this regard are anticipated to be less than significant.

Soil Vapor Investigation

Soil vapor points were installed at nine soil boring locations on-site. Three of these locations were within the southeastern corner of the project site, in close proximity to the ZZ051 site. The other six were spaced throughout the project site. Analytical results indicate that VOCs were detected in all of the soil gas samples. However, none of the detections exceeded the applicable federal and state screening levels detailed in the ESI. As such, emissions from soil excavation are not anticipated to release hazardous materials into the environment, resulting in less than significant impacts.

Long-Term Operational Impacts

Refer to Response 4.9(a), above, for a description of long-term operational impacts related to proposed development at the site. Upon adherence to existing regulations related to hazardous materials, reasonably foreseeable upset and accident impacts during project operations would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. There are no existing or proposed schools within one quarter mile of the project site. The nearest existing school to the project is the Adelanto Elementary school, which is located approximately 0.5 miles southwest of the project site at 17931 Jonathan St, in the City of Adelanto. As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact with Mitigation Incorporated. California Government Code Section 65962.5 requires the DTSC and the State Water Resources Control Board (SWRCB) to compile and update a regulatory site's listing of reported hazardous materials sites (per the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable

levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the California Health and Safety Code. Section 65962.5 also requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste. These lists are made available to the public on EPA's *Cortese List Data Resources* website. Based on the *Cortese List Data Resources* website, the project site is included on a list of hazardous materials sites pursuant to Government Code Section 65962.5.[1] Potential concerns related to the disturbance of existing hazardous materials during the short-term construction process are discussed in Responses 4.9(a) and 4.9(b), above. Upon implementation of Mitigation Measures HAZ-1 and HAZ-2, impacts in this regard would be less than significant.

Mitigation Measures: Refer to Mitigation Measures HAZ-1 and HAZ-2.

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 for people residing or working in the project area?

Less Than Significant Impact. As noted throughout this analysis, the project site is within the Southern California Logistics Airport (SCLA) sphere of influence. Accordingly, the project site occurs within the limits of the review area of the SCLA Airport Comprehensive Land Use Plan (CLUP). Although the CLUP has not been adopted by the City, the plan includes land use controls and policies to protect the public from aircraft noise and to ensure that people and surrounding facilities are not concentrated in areas susceptible to hazardous events.

Table 3A, *Land Use Compatibility Standards* of the CLUP depicts the level of compatibility different forms of land use and specific review areas of the SCLA Specific Plan area. Review areas are depicted in Exhibit 3B, Compatibility Review Areas of the CLUP. Exhibit 3B shows the project site to be located within Compatibility Review Area 3. According to Table 3A, the proposed land uses of the project would be acceptable within Review Area 3. Therefore, under the CLUP, the project would not result in a safety hazard for people residing or working in the project area. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The proposed project would not obstruct implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The City does not identify evacuation routes for the SCLA area, rather, evacuation routes would be determined on a case-by-case basis in the event of a major disaster. The project would comply with all local regulations related to emergency access/evacuation, and is not anticipated to result in significant impacts in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project site is not located in a Very High Fire Hazard Severity Zone, and the risk associated with wildland fires is considered minimal. Refer to Section 4.20, *Wildfire*, for additional analysis in this regard. Impacts are anticipated to be less than significant.

Mitigation Measures: No mitigation is required.

[1] California Environmental Protection Agency, *Cortese List Data Resources*, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed on April 30, 2021.

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4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✓	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river or through the addition of impervious surfaces, in a manner which would:			✓	
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
3) 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?			✓	
4) 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?			✓	

This section is based on the *Preliminary Hydrology Report* (Hydrology Report) and the *Mojave River Watershed Water Quality Management Plan* (WQMP) both prepared by Langan Engineering and Environmental Services and dated April 1, 2021; refer to Appendix F, *Hydrology Report*, and Appendix G, *WQMP*.

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

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCBs to preserve, protect, enhance, and restore water quality. The City of Victorville is within the jurisdiction of the Lahontan RWQCB.

According to the WQMP, the project site is located within the Upper Narrows to Lower Narrows area of the Mojave River Watershed. The RWQCB's *Water Quality Control Plan for the Lahontan Region* (Basin Plan) identifies beneficial

uses for the Mojave River Watershed, including Municipal and Domestic Supply (MUN), Ground Water Recharge (GWR), Warm and Cold Freshwater Habitat (WARM and COLD), and Wildlife Habitat (WILD).[1]

Short-Term Construction

Short-term impacts may result from the disturbance of on-site soils during construction activities. Runoff from the project site during construction would have the potential to violate water quality standards and water quality discharge requirements. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (Construction General Permit). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation.

To obtain coverage under the Construction General Permit, the project must register with the Stormwater Multiple Application and Report Tracking System, as well as develop and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is required to contain a site map(s) that depicts the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs the discharger would implement to mitigate potential pollutants in stormwater runoff and the locations of those BMPs at the construction site. BMPs for construction activities may include measures to control pollutants at particular sources, such as fueling areas, trash storage areas, outdoor materials storage areas, and outdoor work areas. BMPs are also used during treatment of the pollutants at these particular source areas. The following BMPs may be implemented prior to construction to capture sediment, stabilize slopes, and prevent runoff and sediment from leaving the construction site and entering the City's storm drain system and entering receiving waters:

- Silt curtains,
- Erosion control fiber mats,
- Silt fences,
- Sandbag barriers, and
- Sediment traps.

In addition to the BMPs, the SWPPP must contain: a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

The project's construction activity would be subject to the Construction General Permit, as it involves clearing, grading, and disturbances to the ground such as stockpiling or excavation, and a construction site with soil disturbance greater than one acre. The SWPPP is required to outline the erosion, sediment, and non-storm water BMPs, in order to minimize the discharge of pollutants at the construction site. These BMPs would include measures to contain runoff from vehicle washing at the construction site, prevent sediment from disturbed areas from entering the storm drain system using structural controls (i.e., sand bags at inlets), and cover and contain stockpiled materials to prevent sediment and pollutant transport. Implementation of the BMPs would ensure runoff and discharges during the project's construction phase would not violate any water quality standards. Pursuant to the City's Storm Water and Urban Runoff Management and Discharge Control Ordinance, incorporated as Municipal Code Section 10.30.200, proof of compliance with the Construction General Permit must be provided to the City Manager before the City will issue any grading, construction or similar permits applicable to such construction activity. Compliance with NPDES requirements would reduce short-term construction-related impacts to water quality to a less than significant level.

[1] Lahontan Regional Water Quality Control Board, *Water Quality Control Plan for the Lahontan Region*, Chapter 2 (Present and Potential Beneficial Uses), effective March 31, 1995, including amendments effective August 1995 through January 14, 2016.

Long-Term Operations

Long-term operation of the distribution center would similarly have the potential for impacting drainage systems due to pollutants in stormwater runoff (heavy metals, nutrients, and refuse) that could have the potential to affect tributary drainage features. Low-impact development (LID) strategies (post-construction BMPs) should be utilized to infiltrate, store, and reuse stormwater runoff whenever possible.

The total site drainage area for the project is 71.4 acres. Based on the Hydrology Report, peak stormwater flows on-site would increase by approximately 70 cubic square feet for the 100 year storm, and 35 cubic square feet for the 10 year storm; refer to Table 4.10-1, *Drainage Summary of the Proposed Project Areas*.

Table 4.10-1
Drainage Summary

	Existing Condition			Proposed Condition		
Storm Event	100-Year Event	10-Year Event	2-Year Event	100-Year Event	10-Year Event	2-Year Event
Peak Runoff (cfs)	83.034	44.964	25.652	152.817	81.743	43.717
Storm Volume (ac. ft)	15.8492	4.6316	1.7261	15.0529	7.4217	3.856
Source: Langan, Preliminary Hydrology Report for Project Loki, Victorville, CA, April 1, 2021; refer to Appendix F.						

The WQMP was prepared for the project in compliance with the City of Victorville and the Phase II Small MS4 General Permit (Order No. 2013-0001 DWQ) for the Mojave River Watershed. The WQMP identified the following pollutants of concern: nutrients (Phosphorous and Nitrogen), which are found in urban runoff from fertilizers and eroded soils, sediment, metals, oil and grease, trash/debris, pesticides/herbicides, and organic compounds. Based on the WQMP, the following BMPs are recommended for the project:

Non-Structural Source Control BMPs:

- Education of property owners, tenants, and occupants on stormwater BMPs
- Activity restrictions
- Landscape management BMPs
- BMP maintenance
- Title 22 CCR compliance (regulations regarding storage of hazardous materials or waste on-site)
- Local water quality ordinances (City of Victorville's Stormwater Ordinance)
- Spill contingency plan (plans shall mandate stock piling of cleanup materials, notification of agencies, disposal, documentation, etc., and shall comply with hazardous materials regulations regarding the handling, storage, and disposal of hazardous materials and waste)
- Uniform fire code implementation
- Litter/debris control program
- Employee training
- Housekeeping of loading docks
- Catch basin inspection program
- Vacuum sweeping of private streets and parking lots
- Comply with all other applicable NPDES permits
- Provide storm drain system stenciling and signage
- Design and construct trash and waste storage areas to reduce pollution introduction
- Use efficient irrigation systems and landscape design, water conservation, smart controllers, and source control
- Finish grade of landscaped areas at a minimum of one to two inches below top of curb, sidewalk, or pavement
- Protect slopes and channels and provide energy dissipation

Site Design BMPs:

- Minimize impervious areas
- Maximize natural infiltration capacity
- Preserve existing drainage patterns and time of concentration
- Disconnect impervious areas
- Re-vegetate disturbed areas
- Minimize unnecessary compaction in stormwater retention/infiltration basin/trench areas

Treatment BMPs:

- Infiltration basins

Surface runoff on-site would be conveyed via a pipe network to the proposed infiltration basins located at the northern portion of the site. Based on the WQMP, the Design Capture Volume (DCV) (approximately 101,000 cubic feet) would be retained and treated in the proposed infiltration basins, which have an infiltration area of approximately 70,000 square feet. Excess runoff would be detained in the basins and discharged to future infrastructure in Gateway Drive via a restricted capacity outfall that limits discharge to pre-development levels. To allow the full DCV to infiltrate in the required 48 hours, the basin outfall invert will be set approximately 1.4 feet above the basin invert. Emergency overland release for the basins would be via sheet flow to the north.

Furthermore, the City's Stormwater and Urban Runoff Management and Discharge Control Ordinance (Chapter 10.30) is intended to protect and improve water quality of receiving waters. Specifically, Municipal Code Section 10.30.090 specifies that no person shall cause or threaten to cause the discharge of pollutants to the MS4 by exposing such pollutants to storm water runoff. Additionally, owners of parking lot surfaces must clean the parking lot surface as often as necessary to remove refuse, residual oil, grease, or other pollutants that might otherwise be discharged to the MS4 by runoff. Municipal Code Section 10.30.190 addresses control of pollutants from commercial and industrial facilities and specifies that commercial and industrial facilities specified in the Municipal NPDES Permit are required to implement BMPs prescribed by the RWQCB to minimize the discharge of pollutants to the MS4. Municipal Code Section 10.30.200 is intended to control pollutants from new developments and specifies that prior to the construction of a development or new development project, such project shall be evaluated by the City for its potential to discharge pollutants to the MS4 based on its intended land use.

Following compliance with applicable laws and regulations, and implementation of recommended BMPs therein, long-term water quality impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project site exists within the Upper Mojave River Groundwater Basin. This basin is recharged primarily by infiltration of precipitation runoff from the San Bernardino and San Gabriel mountains. It is estimated that 80 percent of the recharge for the entire Mojave Groundwater Basin is supplied by infiltration from with the Upper Mojave River Basin. There is little groundwater recharge from precipitation in the Victor Valley, as a result of low precipitation rates and high evapotranspiration rates. Local groundwater recharge occurs at the Victor Valley Wastewater Reclamation Authority (VVWRA) plant (northeast of SCLA), the treatment system percolation ponds, and various small agricultural areas near the river channel. Based on the Geotechnical Report prepared for the project, the project site's depth to groundwater is in excess of 75 feet below ground surface (bgs).

Short-Term Construction Impacts

The project would not have the potential to result in substantial impacts to groundwater supplies or recharge during construction. Groundwater is not anticipated to be encountered during construction activities associated with the

project. Further, as discussed in Response 4.10(a) above, the project would adhere to existing NPDES requirements, including the preparation of a SWPPP, which would sufficiently minimize short-term water quality construction impacts. Impacts in this regard would be less than significant.

Long-Term Operational Impacts

The proposed project would not include any land uses or facilities that would require groundwater extraction or have the capacity to substantially decrease groundwater supplies or recharge. The proposed project would include construction of a distribution center, associated parking lots, and landscaping, and roadway improvements; refer to Section 2.4, *Project Characteristics*. The project would result in an increase in impervious area on-site as compared to existing conditions. However, as noted above in Response 4.10(a), the project would be required to comply with the WQMP, prepared for the project in compliance with the Victorville MS4 Permit requirements and Phase II NPDES permit (Order No. 2013-0001 DWQ). The WQMP requires implementation of non-structural, design, and treatment BMPs (infiltration basins). It was determined by the WQMP that the increase of impervious surface that would result from project implementation would not impede percolation of runoff into the groundwater basin underneath the project area. The project would not have the capacity to substantially interfere with groundwater recharge, such that there would be a net deficit in aquifer volume or lowering of the groundwater table level during long-term operations. Long-term operational impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

1) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Soil disturbance would temporarily occur during project construction due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, and grading. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via storm water runoff from the project site.

The project would be subject to compliance with the requirements set forth in the NPDES Stormwater General Construction Permit for construction activities; refer to Response 4.10(a). Compliance with the NPDES, including preparation of a SWPPP would reduce the volume of sediment-laden runoff discharging from the site. The implementation of BMPs such as storm drain inlet protection and fiber rolls would reduce the potential for sediment and storm water runoff containing pollutants from entering receiving waters. Therefore, project implementation would not substantially alter the existing drainage pattern of the site during the construction process such that substantial erosion or siltation would occur.

The long-term operation of the proposed distribution center would not have the potential to result in substantial erosion or siltation on- or off-site. Further, project implementation is anticipated to have similar drainage patterns to existing on-site conditions and the project would be required to comply with City's MS4 permit as explained in Response 4.10(a). Thus, impacts in this regard are anticipated to be less than significant.

Mitigation Measures: No mitigation is required.

2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. Refer to Response 4.10(a), above. Based on the Hydrology Report, peak stormwater flows on-site would increase by approximately 70 cubic square feet for the 100 year storm, and 35 cubic square feet

for the 10 year storm; refer to Table 4.10-1. Surface runoff on-site would be conveyed via a pipe network to the proposed infiltration basins located at the northern portion of the site. Based on the WQMP, the DCV (approximately 101,000 cubic feet) would be retained and treated in the proposed infiltration basins, which have an infiltration area of approximately 70,000 square feet. Excess runoff would be detained in the basins and discharged to future infrastructure in Gateway Drive via a restricted capacity outfall that limits discharge to pre-development levels. To allow the full DCV to infiltrate in the required 48 hours, the basin outfall invert will be set approximately 1.4 feet above the basin invert. Emergency overland release for the basins would be via sheet flow to the north. It is not anticipated that the project would increase surface runoff in a manner that would result in on- or off-site flooding. Thus, impacts in this regard are anticipated to be less than significant.

Mitigation Measures: No mitigation is required.

3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Refer to Responses 4.10(a) and 4.10(c)(2), above. Although implementation of the project would result in an increase in impervious area, the proposed stormwater system and infiltration basins would collect on-site stormwater at the project site and treat the water resulting in less runoff leaving the project site than the existing condition. Therefore, the development is not expected to exceed the capacity of the existing/planned stormwater drainage systems and water quality impacts would be minimized to a less than significant level. Thus, impacts in this regard are anticipated to be less than significant.

Mitigation Measures: No mitigation is required.

4) Impede or redirect flood flows?

No Impact. The current Flood Insurance Study (FIS) published by the Federal Emergency Management Agency (FEMA) indicate that the floodplain associated with the Mojave River does not extend onto the project site.[2] No impacts would result in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes.

Refer to Response 4.10(c)(4) for a discussion regarding flood hazards. There are no water bodies in proximity to the project site capable of substantial seiche. In addition, the project site is located approximately 70 miles east of the Pacific Ocean and is not situated within the tsunami or dam inundation area. Therefore, no impact would occur in this regard.

Mitigation Measures: No mitigation is required.

[2] Federal Emergency Management Act Flood Map, FIRM Panel No. 060270 5825 B, 23 June 1981, https://msc.fema.gov/portal, accessed on April 7, 2021.

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

Less Than Significant Impact. As discussed in Responses 4.10(a) and 4.10(b) above, the project would comply with NPDES and RWQCB requirements, and would not have the capacity to conflict with a water quality control plan or groundwater management plan for the region. Therefore, a less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✓

a) Physically divide an established community?

No Impact. The proposed project would not result in impacts related to the division of an established community. The proposed distribution center would be constructed on primarily undeveloped land, designated "Industrial" by the SCLA Specific Plan. Surrounding land uses in proximity to the project site are comprised of open space, SCLA runway and airport support facilities, industrial, and residential uses. The residential uses to the west, located within the City of Adelanto, are currently separated from the project site by vacant/disturbed land and Adelanto Road. Public access to the project is currently precluded. Thus, no impacts would result in this regard.

Mitigation Measures: No mitigation is required.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact.

VICTORVILLE GENERAL PLAN CONSISTENCY

The Victorville Land Use and Zoning Map designates the project site as "Specific Plan." The project's land use consistency with the SCLA Specific Plan standards and design guidelines are discussed below. The project would be consistent with the Victorville General Plan goals and policies in regards to air quality, energy, greenhouse gases, and noise; refer to Sections 4.3, 4.6, 4.8, and 4.13 of this Initial Study, respectively and no impact would occur in this regard.

SCLA SPECIFIC PLAN CONSISTENCY

The SCLA Specific Plan designates the project site as "Industrial (I)". The Industrial designation is intended for development of a broad range of industrial activities, including larger scale industrial. A range of permitted uses includes distribution centers, processing facilities, heavy/light manufacturing, and warehousing, among others. As such, the proposed distribution center would be consistent with the Industrial land use designation for the project site. Additionally, the project would be consistent with Section 4 of the SCLA Specific Plan, *Development Standards*, and Table 4.4, *Industrial (I) Designation Development Standards* (maximum lot coverage, area, and dimensions, maximum building height and minimum setbacks, and minimum parking setbacks). The project would also be consistent with the SCLA Specific Plan Design Guidelines (Section 5.0), which includes guidelines pertaining to parking, pedestrian circulation, walls and fences, environmental control, refuse collection and storage, utilities, landscape, architectural design, lighting, and signage. The project would be subject to Site Plan Review by the City in order to verify consistency in this regard. In addition, the project is consistent with the goals for economic development in the SCLA Specific Plan area, creating new jobs within the City. As such, the project would be consistent with the SCLA Specific Plan and no impact would occur in this regard.

SCLA COMPREHENSIVE LAND USE PLAN CONSISTENCY

The SCLA Comprehensive Land Use Plan (CLUP) is intended to protect and promote the safety and welfare of airport users, residents, and visitors to the cities of Victorville and Adelanto, while promoting the continued operation of the airport. The plan includes land use controls and policies to protect the public from aircraft noise, ensure people and facilities are not concentrated in areas susceptible to aircraft crashes, and ensure no structures or activities encroach upon or adversely affect the use of navigable airspace. It should be noted the CLUP was drafted for the City of Victorville in 2008 by Coffman Associates, Inc; however, this document was not officially adopted by the City. Thus, the CLUP is not a regulatory document, but generally contains information that can be used to inform land use decisions for the purposes of the project.

Based on Exhibit 3B of the SCLA CLUP, *Compatibility Review Areas*, and Table 3A, *Land Use Compatibility Standards*, the project site is located within Review Area 3 and the project (distribution center land use) would be "normally acceptable." A "normally acceptable" land use is defined as a land use that is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. As such, the project would be consistent with the SCLA CLUP and no impact would occur in this regard.

Mitigation Measures: No mitigation is required.

4.12 MINERAL RESOURCES

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

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?

No Impact. According to the General Plan, the project site is within State Mineral Resource Zone 3a (MRZ), which includes "areas containing known mineral occurrences of undetermined mineral resource significance." The General Plan and SCLA Specific Plan do not designate mineral resource recovery on-site. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.12 (a), above. No known mineral resources are located within the project site, and no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.13 NOISE

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✓		
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	
e. 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?			✓	

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air, and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 PM and 7:00 AM. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

REGULATORY SETTING

State

State Office of Planning and Research Noise Element Guidelines. The State Office of Planning and Research (OPR) *Noise Element Guidelines* include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The *Noise Element Guidelines* contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the Community Noise Equivalent Level (CNEL)[1]. A noise environment of 50 CNEL to 60 CNEL is considered to be "normally acceptable" for residential uses. OPR recommendations also note that, under certain conditions, more restrictive standards than the maximum levels cited may be appropriate.

Local

Southern California Logistics Airport Comprehensive Land Use Plan. The SCLA Comprehensive Land Use Plan (CLUP) is intended to protect and promote the safety and welfare of airport users, residents, and visitors to the cities of Victorville and Adelanto, while promoting the continued operation of the airport. The plan includes land use controls and policies to protect the public from aircraft noise, ensure people and facilities are not concentrated in areas susceptible to aircraft crashes, and ensure no structures or activities encroach upon or adversely affect the use of navigable airspace. It should be noted the CLUP was drafted for the City of Victorville in 2008 by Coffman Associates, Inc; however, this document was not officially adopted by the City. Thus, the CLUP is not a regulatory document, but generally contains information that can be used to inform land use decisions for the purposes of the project. The CLUP's land use compatibility standards are identified in Table 4.13-1, *Comprehensive Land Use Plan - Land Use Compatibility Standards*.

City of Victorville General Plan. Policies and implementation measures pertaining to noise are contained in the Land Use and Noise Elements of the City of Victorville General Plan 2030 (Victorville General Plan). The policies and implementation measures relevant to the proposed project include the following:

Land Use Element

Policy 1.2.1: Manage development in a manner that does not conflict with the operations of Southern California Logistics Airport (SCLA).

Implementation Measure 1.2.1.1: Reserve the space around SCLA for airport compatible uses and specifically bar residential development within the flight pattern and noise cones of the airport.

Table 4.13-1
Comprehensive Land Use Plan - Land Use Compatibility Standards

Land Use Category	Review Area 1 Runway Protection Zone	Review Area 2 Future 65 CNEL Contour	Review Area 3 Part 77 Horizontal Surface	Review Area 4 Airport Planning Area
Residential – Single Family, Duplex, Mobile Home	CU	CU	CU	NA[3]
Residential – Multi-Family	CU	CU	CU	NA[3]
Transient Lodging – Motels, Hotels	CU	CU	CA[1]	NA

[1] CNEL is a rating of community noise exposure to all sources of sound that differentiates between daytime, evening, and nighttime noise exposure. These adjustments are +5 dBA for the evening, 7:00 a.m. to 10:00 p.m., and +10 dBA for the night, 10:00 p.m. to 7:00 a.m.

Table 4.13-1 (continued)
Comprehensive Land Use Plan - Land Use Compatibility Standards

Land Use Category	Review Area 1 Runway Protection Zone	Review Area 2 Future 65 CNEL Contour	Review Area 3 Part 77 Horizontal Surface	Review Area 4 Airport Planning Area
Schools, Libraries, Churches, Hospitals, Nursing Homes	CU	CU	CA[1]	NA
Auditoriums, Concert Halls	CU	CU	CA	NA
Sports Arenas, Outdoor Spectator Sports, Amphitheaters	CU	CU	CU	NA
Playgrounds, Neighborhood Parks	CU	CA[1]	NA[2]	NA
Golf Courses, Riding Stables, Water Recreation, Cemetery	CU	CA[1]	CA[2]	NA
Office Buildings, Business Commercial, Professional	CU	CA[1]	NA[2]	NA
Manufacturing, Transportation Services, Contract Construction	CU	NA[1]	NA[2]	NA
Wholesale/Warehouse Operations, Salvage Operations	CU	NA[1]	NA[2]	NA
Utilities	CU	NA[1]	NA[2]	NA
Agriculture	NA	NA	NA	NA
Livestock, Animal Breeding	CU	NA[1]	NA[2]	NA
Retail Trade/Commercial Services	CU	CA[1]	NA[2]	NA
1. The average intensity should not exceed 100 people per gross acre 2. The average intensity should not exceed 150 people per gross acre 3. Fair disclosure notice required for residential real estate transactions				
NA – 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. CA – Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Uses also subject to intensity/density restrictions for the purposes of public safety. CU – Clearly Unacceptable: New construction of development should generally not be undertaken due to noise and safety concerns.				

Noise Element

Policy 1.1.2: Continue to ensure that there is no conflict or inconsistency between the operation of the Southern California Logistics Airport and future land uses within the Planning Area.

Policy 2.1.1: Continue to implement acceptable standards for noise for various land uses throughout the City.

Implementation Measure 2.1.1.2: Monitor noise complaints and enforce provisions of the City noise ordinance.

Implementation Measure 2.1.1.5: Continue to restrict noise and require mitigation measures for any noise-emitting construction equipment or activity.

In addition, the Noise Element of the Victorville General Plan identifies acceptable and unacceptable noise levels for various land uses as established by the U.S. Department of Housing and Urban Development and State of California Guidelines. The City's land use compatibility standards are identified in Table 4.13-2, *Victorville Land Use Compatibility Standards*.

Table 4.13-2
Victorville Land Use Compatibility Standards

Land Use Category	Community Noise Exposure, L_{dn} or CNEL, dB						
	55	60	65	70	75	80+	--
Residential - Low Density, Single Family, Duplex, Multifamily, 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

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 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: Victorville General Plan, Table N-3, Victorville Land Use Compatibility Standards, page N-6.

City of Victorville Municipal Code. Chapter 13.01, *Noise Control*, of the Victorville Municipal Code establishes criteria and standards for the regulation of noise levels within the City of Victorville. As outlined in Chapter 13.01 and as indicated in Table 4.13-3, *Ambient Noise Levels Standards*, maximum ambient noise levels are based on zoning. The criteria and standards relevant to the proposed project are discussed below.

Table 4.13-3
Ambient Noise Levels Standards

Zone	Time Period	Sound Level Decibels (dba)[1]
All Residential Zones	10 p.m. – 7 a.m.	55
	7 a.m. – 10 p.m.	65
All Commercial Zones	Anytime	70
All Industrial Zones	Anytime	75

Notes:
1. If ambient noise level exceeds the applicable limit noted, the ambient noise level shall be the standard.

Source: Victorville Municipal Code, Section 13.01.040, *Base Ambient Noise Levels.*

Victorville Municipal Code Section 13.01.050, *Noise Levels Prohibited*, states that noise levels shall not exceed the ambient noise levels identified in Section 13.01.040 by the following dBA levels for the cumulative period of time specified:

1. Less than 5 dB(A) for a cumulative period of more than thirty minutes in any hour;
2. Less than 10 dB(A) for a cumulative period of more than fifteen minutes in any hour;
3. Less than 15 dB(A) for a cumulative period of more than five minutes in any hour;

4. Less than 20 dB(A) for a cumulative period of more than one minute in any hour;

5. 20 dB(A) or more for any period of time.

Victorville Municipal Code Section 13.01.06, *Noise Source Exemptions*, identifies the following activities as being exempted from the provisions of Chapter 13.01:

- All mechanical devices, apparatus or equipment used, related to or connected with emergency machinery, vehicle or work.
- Traffic on any roadway or railroad right-of-way.
- Construction activity on private properties that are determined by the director of building and safety to be essential to the completion of a project.

City of Adelanto General Plan. Given the project site's adjacency to the City of Adelanto, relevant noise standards for Adelanto are also included within this section. The City of Adelanto has adopted noise standards in the Noise Element of the *General Plan for City of Adelanto* (Adelanto General Plan). The City of Adelanto's noise compatibility criteria by land use is summarized in Table 4.13-4, *Land Use Compatibility for Community Noise Environments*, and is consistent with both Federal and State standards and guidelines. The noise standards relevant to the proposed project are discussed below.

Table 4.13-4
Land Use Compatibility Guidelines Related to Noise Exposure

Land Use	DNL 65-70	DNL 70-75	DNL 75 & Above
RESIDENTIAL			
Residential other than mobile homes and transient lodgings	NLR required[1]	NLR required	Incompatible
Mobile Homes	Incompatible	Incompatible	Incompatible
Transient lodgings	NLR required[1]	NLR required[1]	Incompatible
PUBLIC USE			
Schools, hospitals, and nursing homes	NLR required[1]	Incompatible	Incompatible
Churches, auditoriums, and concert halls	NLR required[1]	NLR required	Incompatible
Governmental services	Compatible	NLR required	NLR required[1]
Transportation	Compatible	Compatible[2]	Compatible[2]
Parking	Compatible	Compatible[2]	Compatible[2]
COMMERCIAL USE			
Offices, business, and professional	Compatible	NLR required	NLR required
Wholesale and retail – building materials, hardware, and farm equipment	Compatible	Compatible[2]	Compatible[2]
Retail trade – general	Compatible	NLR required	NLR required
Utilities	Compatible	Compatible[2]	Compatible
Communication	Compatible	NLR required[1]	NLR required
MANUFACTURING AND PRODUCTION			
Manufacturing, general	Compatible	Compatible[2]	Compatible[2]
Photographical and optical	Compatible	NLR required	NLR required
Agriculture (except livestock) and forestry	Compatible	Compatible	Compatible
Livestock framing and breeding	Compatible	Compatible	Incompatible
Mining and fishing, resource production and extraction	Compatible	Compatible	Compatible
RECREATIONAL			
Outdoor sports arenas and spectator sports	Compatible	Compatible	Incompatible
Outdoor music shells, amphitheaters	Incompatible	Incompatible	Incompatible

Table 4.13-4 (Continued)
Land Use Compatibility Guidelines Related to Noise Exposure

Land Use	DNL 65-70	DNL 70-75	DNL 75 & Above
Nature exhibits and zoos	Compatible	Incompatible	Incompatible
Amusements, parks, resorts, and camps	Compatible	Compatible	Incompatible
Golf courses, riding stables, and water recreation	Compatible	Compatible	Incompatible
DNL (CNEL): California Noise Equivalency Level in decibels. COMPATIBLE: Generally, no special noise attenuating materials are required to achieve an interior noise level of CNEL 45 in habitable spaces, or the activity (whether indoors or outdoors) would not be subject to a significant adverse effect by the outdoor noise level. NLR: Noise Level Reduction. NLR is used to denote the total amount of noise transmission loss in decibels required to reduce an exterior noise level in habitable interior spaces to DNL (CNEL) 45. INCOMPATIBLE: Generally, the land use, whether in a structure or an outdoor activity, is considered to be incompatible with the outdoor noise level even if special attenuating materials were to be used in the construction of the building.			
1. The land use is generally incompatible with aircraft noise and should only be permitted in areas of infill in existing neighborhoods or where the community determines that the use must be allowed. 2. NLR required in offices or other areas with noise-sensitive activities.			
Source: City of Adelanto, *City of Adelanto General Plan, Noise Element*, Table VIII-2 (Land Use Compatibility Guidelines Related to Noise Exposure), dated November 1993.			

City of Adelanto Municipal Code. The City of Adelanto Municipal Code (Adelanto Municipal Code) Section 17.90.020, *Noise*, identifies exterior noise level standards for noise-sensitive receiving land uses in the City of Adelanto. Additionally, Section 17.90.030, *Vibration*, defines groundborne vibration standards within the City of Adelanto. Noise and vibration standards relevant to the proposed project are discussed below.

Section 17.90.020 – Noise

(b) Noise Standards

1. The noise standards contained in Table VIII-2 (Table 4.13-4), "Land Use Compatibility Guidelines Related to Noise Exposure" in the Noise Element of the General Plan shall apply to land uses city-wide and shall be used to define acceptable and unacceptable noise levels.

2. No person shall operate or cause to operate any source of sound at any location or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes the noise level, when measured on any other property, either incorporated or unincorporated, to exceed:

   a. The noise standard plus three (3) dBA for that receiving land use specified in Table VIII-2 (Table 4.13-4) of the General Plan Noise Element for a cumulative period of more than thirty (30) minutes in any hour; or

   b. The noise standard plus five (5) dBA for a cumulative period of more than five (5) minutes in any hour; or

   c. The noise standard plus ten (10) dBA for a cumulative period of more than three (3) minutes in any hour; or

   d. The noise standard plus fifteen (15) dBA for a cumulative period of more than one (1) minute in any hour; or

   e. The noise standard plus twenty (20) dBA for any period of time.

3. If the measured ambient level exceeds any of the first four (4) noise limit categories above, the allowable noise exposure standard shall be increased to reflect the ambient noise level. If the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.

4. If the alleged offense consists entirely of impact noise or simple tone noise, each of the noise levels in Section 17.90.020(b)(2)A. shall be reduced by five (5) dBA.

(c) Exempt Noises

The following activities shall be exempted from the provisions of this Chapter:

- All mechanical devices, apparatus or equipment used, and related to or connected with emergency machinery, vehicles or activities.

- Traffic on any roadway or railroad right-of-way.

- Construction activity on private properties that are determined by the Building Official to be essential to the completion of a project, and are in compliance with Section 17.90.020(d)(1) of this Chapter.

(d) Construction Practices

To reduce potential noise and air quality nuisances, the following items shall be listed as "General Notes" on the construction drawings:

1. Construction activity and equipment maintenance is limited to the hours between 7:00 a.m. to dusk on weekdays. Construction may not occur on weekends or State holidays, without prior consent of the Building Official. Non-noise generating activities (e.g. interior painting) are not subject to these restrictions. City and State construction projects, such as road re-building or resurfacing, and any construction activity that is in response to an emergency, shall be exempt from this requirement.

2. Stationary construction equipment that generates noise in excess of sixty-five (65) dBA at the project boundaries must be acoustically shielded and located at least one hundred feet (100') from occupied residences. The equipment area with appropriate acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities.

3. Construction routes are limited to City of Adelanto designated truck routes.

4. Water trucks or sprinkler systems shall be used during clearing, grading, earth moving, excavation, or transportation of cut or fill materials to prevent dust from leaving the site and to create a crust after each day's activities cease. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds fifteen (15) miles per hour.

5. A person or persons shall be designated to monitor the dust control program and to order increased watering as necessary to prevent transport of dust off-site. The name and telephone number of such person(s) shall be provided to the City.

6. All grading equipment shall be kept in good working order per factory specifications.

Section 17.90.030 – Vibration

(a) Vibration Standard

No ground vibration shall be allowed which can be felt without the aid of instruments at or beyond the subject property line, nor will any vibration be permitted which produces a particle velocity greater than or equal to two-tenths of an inch (0.2") per second measured at or beyond the lot line.

(b) Vibration Measurement

Vibration velocity shall be measured with a seismograph or other instrument capable of measuring and recording displacement and frequency, particle velocity, or acceleration. Readings are to be made at points of maximum vibration along any lot line next to a lot within a residential, commercial, or industrial land use district.

(c) Exempt Vibrations

Except as provided in the Municipal Code, the following sources of vibration are not regulated by this Zoning Code:

1. Motor vehicles subject to regulation under the California Vehicle Code.

EXISTING MOBILE SOURCES

The majority of the existing noise from mobile sources in the project area is generated from vehicle sources along Air Expressway to the south of the project site. Mobile source noise was modeled using the Federal Highway Administration's Highway Noise Prediction Model (FHWA RD-77-108), which incorporates several roadway and site parameters. The model does not account for ambient noise levels. Noise projections are based on modeled vehicular traffic as derived from the *Lot 44 Roadway Segment Average Daily Traffic Estimates Table* (ADT Study), prepared by Michael Baker International (March 2021); refer to Appendix H, *Noise Data*. As shown in Table 4.13-5, *Existing Traffic Noise Levels*, mobile noise sources in the vicinity of the project site range from 45.3 dBA to 61.5 dBA.

Table 4.13-5
Existing Traffic Noise Levels

Roadway Segment	Existing Conditions				
	ADT	dBA @ 100 Feet from Roadway Centerline	Distance from Roadway Centerline to: (Feet)		
			70 CNEL Noise Contour	65 CNEL Noise Contour	60 CNEL Noise Contour
Adelanto Road					
Chamberlain Way/Momentum to Bartlett Avenue/Innovation Way	550	45.3	-	-	-
Bartlett Avenue/Innovation Way to Air Expressway	1,090	50.6	-	-	-
Gateway Drive					
Momentum to Innovation Way	600	48.0	-	-	-
Innovation Way to Air Expressway	1,040	50.3	-	-	-
Chamberlain Way					
West of Adelanto Road	840	45.6	-	-	-
Momentum					
Adelanto Road to Gateway Drive	NA	NA	NA	NA	NA
Bartlett Avenue					
West of Adelanto Road	2,240	52.5	-	-	-
Innovation Way					
Adelanto Road to Gateway Drive	580	47.8	-	-	-
Air Expressway					
West of Gateway Drive	11,550	61.0	-	54	116
East of Gateway Drive	12,930	61.5	-	58	125

Notes: ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level, - = Contour located within the roadway right of way; NA = not applicable (does not exist without project).

Source: Based on traffic data within the *Lot 44 Roadway Segment Average Daily Traffic Estimates Table*, prepared by Michael Baker International, March 2021.

EXISTING STATIONARY SOURCES

The project area consists of residential, commercial, industrial, open space, and airport uses. The primary sources of stationary noise in the project vicinity are related to airport activities, parking areas, slow-moving trucks, mechanical equipment, and commercial/industrial activities. The noise associated with these sources may represent a single-event or a continuous occurrence.

NOISE MEASUREMENTS

In order to quantify existing ambient noise levels in the project area, Michael Baker International (Michael Baker), conducted three short-term noise measurements on April 20, 2021; refer to Table 4.13-6, *Noise Measurements*. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. The ten-minute measurements were taken between 10:00 a.m. and 11:30 a.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day and relate closely with the noise standards for the project area. Exhibit 4-1, *Noise Measurement Locations*, depicts the location of the noise measurements.

Table 4.13-6
Noise Measurements

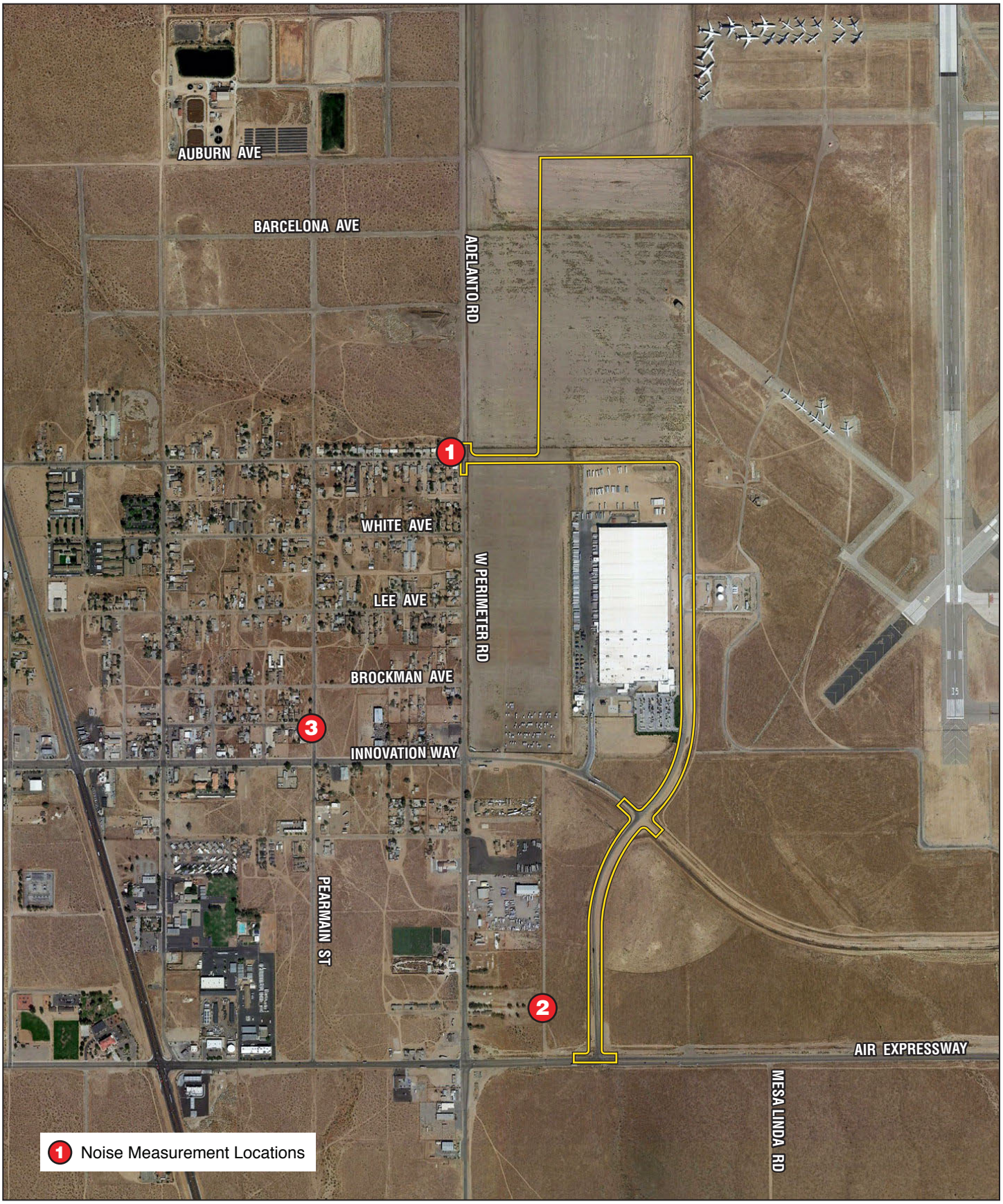
Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
1	Directly east of residence located at 12092 Chamberlaine Way	45.7	31.5	58.5	82.3	10:21 a.m.
2	Directly east of residence located at 17767 Adelanto Road, approximately 280 feet north of Air Expressway	54.9	43.9	65.6	90.9	10:43 a.m.
3	Directly east of Church of Christ Adelanto	61.6	38.1	83.8	101.0	11:05 a.m.
Source: Michael Baker International, April 20, 2021.						

Meteorological conditions when the measurements were taken were clear skies, warm temperatures, with moderate wind speeds (less than 10 miles per hour), and low humidity. Measured noise levels during the daytime measurements ranged from 45.7 to 61.6 dBA L_{eq}. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I (precision) sound level meters. The results of the field measurements are included in Appendix H.

SENSITIVE RECEPTORS

Sensitive populations are more susceptible to the effects of noise than are the general population. Land uses considered sensitive by the State of California include schools, playgrounds, athletic facilities, hospitals, rest homes, rehabilitation centers, long-term care and mental care facilities. Generally, a sensitive receptor is identified as a location where human populations (especially children, senior citizens, and sick persons) are present.

Land uses less sensitive to noise are business, commercial, and professional developments. Noise receptors categorized as being least sensitive to noise include industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, and transit terminals. These types of land uses often generate high noise levels. Moderately sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, and outpatient clinics. The nearest sensitive receptors are residences located directly to the west of the project site. Specifically, the nearest sensitive receptor property line is located in the City of Adelanto, approximately 50 feet from the proposed Gateway Drive improvements and approximately 700 feet to the west of the distribution center site boundaries.



Source: Google Earth Pro, April 2021

NOT TO SCALE

Michael Baker INTERNATIONAL

Project Site

04/2021 JN 182596

SOUTHERN CALIFORNIA LOGISTICS AIRPORT (SCLA)
LOT 44 DISTRIBUTION CENTER PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Noise Measurement Locations

Exhibit 4-1

Impact Analysis

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

Less Than Significant Impact With Mitigation Incorporated. It is difficult to specify noise levels that are generally acceptable to everyone; what is annoying to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels or based on studies of the ability of people to sleep, talk, or work under various noise conditions. However, studies recognize that individual responses vary considerably. Standards usually address the needs of the majority of the general population.

Short-Term Noise Impacts

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction activities would include grading, building construction, paving, and architectural coatings. Ground-borne noise and other types of construction-related noise impacts typically occur during the initial earthwork phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in Table 4.13-7, *Maximum Noise Levels Generated by Construction Equipment*. It should be noted that the noise levels identified in Table 4.13-7 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table 4.13-7
Maximum Noise Levels Generated by Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 50 Feet (dBA)
Concrete Saw	20	90
Crane	16	81
Augur Drill Rig	20	85
Concrete Mixer Truck	40	79
Backhoe	40	78
Dozer	40	82
Excavator	40	81
Forklift	40	78
Paver	50	77
Roller	20	80
Tractor	40	84
Water Truck	40	80
Grader	40	85
General Industrial Equipment	50	85

Note:
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

The closest sensitive receptors to the project site are the single-family residential uses immediately to the west of the project site, within the City of Adelanto. Specifically, the sensitive receptors would be located as close as approximately 50 feet from the proposed Gateway Drive improvements. These sensitive uses may be exposed to elevated noise levels during project construction.

Construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near adjacent sensitive uses. Pursuant to Victorville Municipal Code Section 13.01.06 and Adelanto Municipal Code Section 17.90.020, construction noise is exempt from noise regulations within the City of Victorville and the City of Adelanto. However, in accordance with Victorville General Plan Implementation Measures 2.1.1.2 and 2.1.1.5, the project would monitor noise complaints and require mitigation measures for noise-emitting construction equipment. Specifically, the project would implement Mitigation Measure NOI-1 which would reduce short-term construction noise impacts through noise reduction methods. Mitigation Measure NOI-1 requires all construction equipment to be equipped with properly operating and maintained mufflers, locate stationary construction equipment so that emitted noise is directed away from the nearest noise sensitive receptors, and locate equipment staging in areas furthest away from sensitive receptors. Additionally, Mitigation Measure NOI-1 requires construction activities occurring adjacent to the City of Adelanto to comply with construction hours established in Adelanto Municipal Code Section 17.90.020(d)(1).

In compliance with Adelanto Municipal Code Section 17.90.020(1) and Mitigation Measure NOI-1, construction occurring adjacent to the City of Adelanto would be limited to the hours between 7:00 a.m. to dusk on weekdays and is prohibited on weekends or State holidays. As previously discussed, groundborne noise and other types of construction-related noise impacts would typically occur during the grading construction phase and have the potential to create the highest levels of noise. As such, the grading phase represents the worst-case condition for short-term construction noise levels that may occur at the nearest noise-sensitive receptors within the City of Adelanto. To determine the distance at which noise-generating constriction equipment operating on the project site would have to comply with Adelanto Municipal Code Section 17.90.020(1), the three loudest pieces of equipment (i.e. grader, scraper, and dozer) operating during the grading phase were modeled with the Federal Highway Administration's Roadway Construction Noise Model (RCNM); refer to Appendix H. Based on RCNM results, noise-generating construction equipment occurring at a distance of 550 feet from the source would not exceed the City of Adelanto's land use compatibility guidelines for residential uses (i.e. 65 dBA). Therefore, noise-generating construction equipment situated within 550 feet of the City of Adelanto would have to comply with the construction hours established in Adelanto Municipal Code Section 17.90.020(d)(1). With implementation of Mitigation Measure NOI-1, construction noise impacts would be less than significant.

Long-Term Noise Impacts

Mobile Noise

To assess the mobile noise level impacts associated with development of the proposed project, traffic noise modeling was conducted for the proposed project using the traffic volumes from the project's ADT Study and the FHWA's RD-77-108 traffic noise model. The modeling results are included in Appendix H. Mobile noise levels were modeled for the following traffic scenarios:

- Existing Conditions Without/With Project: This scenario refers to the existing present-day noise conditions without and with the proposed project.

- Opening Year 2022 Without/With Project: This scenario refers to Opening Year 2022 noise conditions without and with the proposed project. As a worst-case analysis, this scenario considers buildout of the SCLA Specific Plan in the year 2022.

The proposed project would cause increases in traffic along local roadways. In community noise assessments, a 3 dBA increase is considered "barely perceptible," and increases over 5 dBA are generally considered "readily

perceptible".[1] Because the expected ambient noise increase would occur over a long period of time as opposed to an immediate change in noise, a significant impact would occur for roadways where buildout of the proposed project would result in a noise increase of 3 dBA or more in an environment where the ambient noise level is above the normally acceptable land use compatibility standard for the existing adjacent land uses; refer to Table 4.13-2 and Table 4.13-4.

Existing Traffic Noise

Based upon traffic data within the ADT Study, the "Existing Without Project" and "Existing With Project" were compared for future noise conditions along roadway segments in the project vicinity. According to Table 4.13-8, *Existing With Project Traffic Noise Levels*, under the "Existing Without Project" scenario, noise levels at a distance of 100 feet from the roadway centerline would range from approximately 45.3 dBA to 61.5 dBA, with the highest noise levels occurring along Air Expressway, east of Gateway Drive. The "Existing With Project" scenario noise levels at a distance of 100 feet from the roadway centerline would range from approximately 44.5 dBA to 61.8 dBA, with the highest noise occurring along the same roadway segment. As shown in Table 4.13-8, the Gateway Drive and Momentum roadway segments would exceed the 3.0 dBA increase threshold as a result of the proposed project. However, these noise levels would not exceed the normally acceptable land use compatibility standard. Therefore, existing noise conditions along roadway segments in the project vicinity would not exceed the applicable normally acceptable land use compatibility standard and the 3.0 dBA increase threshold simultaneously. Thus, a less than significant impact would occur in this regard.

Table 4.13-8
Existing With Project Traffic Noise Levels

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Existing Without Project Traffic Noise Level (dBA)	Existing With Project Traffic Noise Level (dBA)	*Normally Acceptable Land Use Compatibility Standard Threshold (dBA)*[1]	Project Noise Level Increase (dBA)	*Increase Significance Threshold (dBA)*	Both Thresholds Exceeded?
Adelanto Road							
Chamberlain Way/Momentum to Bartlett Avenue/Innovation Way	Residential/ Commercial	45.3	45.6	*60*	0.3	*3.0*	No
Bartlett Avenue/Innovation Way to Air Expressway	Residential/ Commercial	50.6	50.8	*60*	0.2	*3.0*	No
Gateway Drive							
Momentum to Innovation Way	Industrial	48.0	55.2	70	7.3	*3.0*	No
Innovation Way to Air Expressway	Vacant Land	50.3	55.7	-	5.4	*3.0*	No
Chamberlain Way							
West of Adelanto Road	Residential	45.6	45.8	*60*	0.2	*3.0*	No
Momentum							
Adelanto Road to Gateway Drive	Industrial	NA	44.5	*70*	44.5	*3.0*	No
Bartlett Avenue							
West of Adelanto Road	Residential/ Commercial	52.5	52.6	*60*	0.2	*3.0*	No

[1] California Department of Transportation (Caltrans), *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, accessed April 22, 2021.

Table 4.13-8 (Continued)
Existing With Project Traffic Noise Levels

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Existing Without Project Traffic Noise Level (dBA)	Existing With Project Traffic Noise Level (dBA)	*Normally Acceptable Land Use Compatibility Standard Threshold (dBA)*[1]	Project Noise Level Increase (dBA)	*Increase Significance Threshold (dBA)*	Both Thresholds Exceeded?
Innovation Way							
Adelanto Road to Gateway Drive	Commercial/ Vacant Land	47.8	48.3	65	0.5	*3.0*	No
Air Expressway							
West of Gateway Drive	Commercial/ Vacant Land	61.0	61.4	65	0.5	*3.0*	No
East of Gateway Drive	Vacant Land	61.5	61.8	-	0.4	*3.0*	No

Notes:
"-" = noise thresholds do not apply to vacant land; dBA = A-weighted decibels; NA = not applicable (does not exist without project).
1. The normally acceptable land use compatibility standard identifies the lowest accepted threshold established by the City of Victorville and City of Adelanto as shown in Table 4.13-2 and Table 4.13-4.

Source: Based on traffic data within the *Lot 44 Roadway Segment Average Daily Traffic Estimates Table*, prepared by Michael Baker International, March 2021.

Opening Year 2022 Traffic Noise

The "Opening Year Without Project" and "Opening Year With Project" scenarios were compared (opening year has been analyzed as 2022). According to Table 4.13-9, *Opening Year Traffic Noise Levels*, under the "Opening Year Without Project" scenario, the noise levels would range from approximately 45.6 dBA to 61.5 dBA, with the highest noise levels occurring along Air Expressway, east of Gateway Drive. Under the "Opening Year With Project" scenario, the noise levels would range from approximately 44.5 dBA to 61.9 dBA, with the highest noise levels occurring along the same roadway segment. As shown in Table 4.13-9, the Gateway Drive and Momentum roadway segments would exceed the 3.0 dBA increase threshold as a result of the proposed project. However, these noise levels would not exceed the normally acceptable land use compatibility standard. Therefore, as future noise conditions along roadway segments in the project vicinity would not exceed the applicable normally acceptable land use compatibility standard and the 3.0 dBA increase threshold simultaneously, impacts would be less than significant.

Table 4.13-9
Opening Year Traffic Noise Levels

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Opening Year Without Project Traffic Noise Level (dBA)	Opening Year With Project Traffic Noise Level (dBA)	*Normally Acceptable Land Use Compatibility Standard Threshold (dBA)*[1]	Project Noise Level Increase (dBA)	*Increase Significance Threshold (dBA)*	Both Thresholds Exceeded?
Adelanto Road							
Chamberlain Way/Momentum to Bartlett Avenue/Innovation Way	Residential/ Commercial	45.6	45.9	*60*	*0.3*	*3.0*	No
Bartlett Avenue/Innovation Way to Air Expressway	Residential/ Commercial	50.8	51.0	*60*	*0.1*	*3.0*	No

Table 4.13-9 (Continued)
Opening Year Traffic Noise Levels

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Opening Year Without Project Traffic Noise Level (dBA)	Opening Year With Project Traffic Noise Level (dBA)	*Normally Acceptable Land Use Compatibility Standard Threshold (dBA)*[1]	Project Noise Level Increase (dBA)	*Increase Significance Threshold (dBA)*	Both Thresholds Exceeded?
Gateway Drive							
Momentum to Innovation Way	Industrial	48.0	55.2	70	*7.3*	*3.0*	No
Innovation Way to Air Expressway	Vacant Land	50.4	55.7	-	*5.4*	*3.0*	No
Chamberlain Way							
West of Adelanto Road	Residential	45.7	45.9	*60*	*0.2*	*3.0*	No
Momentum							
Adelanto Road to Gateway Drive	Industrial	NA	44.5	*70*	*44.5*	*3.0*	No
Bartlett Avenue							
West of Adelanto Road	Residential/ Commercial	52.6	52.7	*60*	*0.1*	*3.0*	No
Innovation Way							
Adelanto Road to Gateway Drive	Commercial/ Vacant Land	47.8	48.3	65	*0.5*	*3.0*	No
Air Expressway							
West of Gateway Drive	Commercial/ Vacant Land	61.0	61.5	65	*0.5*	*3.0*	No
East of Gateway Drive	Vacant Land	61.5	61.9	-	*0.4*	*3.0*	No

Notes:
"-" = noise thresholds do not apply to vacant land; dBA = A-weighted decibels; NA = not applicable (does not exist without project).
1. The normally acceptable land use compatibility standard identifies the lowest accepted threshold established by the City of Victorville and City of Adelanto as shown in Table 4.13-2 and Table 4.13-4.

Source: Based on traffic data within the *Lot 44 Roadway Segment Average Daily Traffic Estimates Table*, prepared by Michael Baker International, March 2021.

Cumulative Mobile Source Impacts

A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The combined effect compares the "Opening Year With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by a project combined with the traffic noise increase generated by related projects in Adelanto and Victorville. The following criterion has been utilized to evaluate the combined effect of the cumulative noise increase.

- Combined Effect. The cumulative with project noise level ("Opening Year With Project") would cause a significant cumulative impact if a 3.0 dB increase over existing conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.

Although there may be a significant noise increase due to the proposed project in combination with other related projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project. The following criterion has been utilized to evaluate the incremental effect of the cumulative noise increase.

- Incremental Effects. The "Opening Year With Project" causes a 1.0 dBA increase in noise over the "Opening Year Without Project" noise level.

A significant impact would result only if both the combined (including an exceedance of the applicable exterior standard at a sensitive use) and incremental effects criteria have been exceeded. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed project and growth due to occur in the project site's general vicinity would contribute to cumulative noise impacts. Table 4.13-10, *Cumulative Traffic Noise Levels*, provides traffic noise effects along roadway segments in the project vicinity for "Existing," "Opening Year Without Project," and "Opening Year With Project" conditions, including incremental and net cumulative impacts. As indicated in Table 4.13-10, the Incremental Effects criterion of 1.0 dBA and the Combined Effects criterion of 3.0 dBA are exceeded along Gateway Drive (Momentum to Air Expressway) and Momentum (Adelanto Road to Gateway Drive). Although both the combined and incremental effects criteria have been exceeded, cumulative traffic noise levels along Gateway Drive and Momentum would not exceed the applicable normally acceptable land use compatibility standard. Land uses adjacent to the Gateway Drive (Momentum to Air Expressway) and Momentum (Adelanto Road to Gateway Drive) roadway segments include industrial uses located in the City of Victorville. Therefore, as shown in Table 4.13-10, cumulative traffic noise levels along Gateway Drive and Momentum would not exceed the City's exterior noise standards for industrial uses (i.e. 70 dBA CNEL). Thus, the proposed project, in combination with cumulative background traffic noise levels, would result in less than significant cumulative impacts.

Table 4.13-10
Cumulative Traffic Noise Levels

Roadway Segment	Existing	Opening Year Without Project	Opening Year With Project	Combined Effects	Incremental Effects	Opening Year With Project Noise Level Exceeds Normally Acceptable Land Use Compatibility Standard Threshold?	Cumulatively Significant Impact?[1]
	dBA @ 100 Feet from Roadway Centerline	dBA @ 100 Feet from Roadway Centerline	dBA @ 100 Feet from Roadway Centerline	Difference In dBA Between Existing and Opening Year With Project	Difference In dBA Between Opening Year Without Project and Opening Year With Project		
Adelanto Road							
Chamberlain Way/Momentum to Bartlett Avenue/Innovation Way	45.3	45.6	45.9	0.6	0.3	No	**No**
Bartlett Avenue/Innovation Way to Air Expressway	50.6	50.8	51.0	0.3	0.1	No	**No**
Gateway Drive							
Momentum to Innovation Way	48.0	48.0	55.2	7.3	7.3	No	**No**
Innovation Way to Air Expressway	50.3	50.4	55.7	5.4	5.4	No	**No**
Chamberlain Way							
West of Adelanto Road	45.6	45.7	45.9	0.3	0.2	No	**No**
Momentum							
Adelanto Road to Gateway Drive	NA	NA	44.5	44.5	44.5	No	**No**
Bartlett Avenue							
West of Adelanto Road	52.5	52.6	52.7	0.2	0.1	No	**No**
Innovation Way							
Adelanto Road to Gateway Drive	47.8	47.8	48.3	0.5	0.5	No	**No**
Air Expressway							
West of Gateway Drive	61.0	61.0	61.5	0.6	0.5	No	**No**
East of Gateway Drive	61.5	61.5	61.9	0.5	0.4	No	**No**

Notes:
"-" = noise thresholds do not apply to vacant land; dBA = A-weighted decibels; NA = not applicable (does not exist without project).
1. The normally acceptable land use compatibility standard identifies the lowest accepted threshold established by the City of Victorville and City of Adelanto as shown in Table 4.13-2 and Table 4.13-4.

Source: Based on traffic data within the *Lot 44 Roadway Segment Average Daily Traffic Estimates Table*, prepared by Michael Baker International, March 2021.

Stationary Noise Impacts

The project proposes a 1,080,308 square-foot distribution building, which includes 36,241 square feet of office space. Stationary noise sources associated with the proposed project would include mechanical equipment, slow-moving trucks, loading docks, and parking activities. As noted above, the nearest sensitive receptors are located to the west of the project site, within the City of Adelanto. A discussion of the project's stationary noise sources is provided below.

Mechanical Equipment. Heating, ventilation, and air conditioning (HVAC) systems typically result in noise levels that average 55 dBA at 50 feet from the source.[2] The nearest sensitive receptors are residential uses located in the City of Adelanto approximately 992 feet southwest of the proposed HVAC units for the warehouse building and main office. HVAC units would be included on the roof of the structure. At a distance of 992 feet, HVAC noise levels would attenuate to 29 dBA. Therefore, HVAC noise levels would not exceed the City of Adelanto's residential noise threshold (i.e., 65 dBA). Furthermore, HVAC noise levels would be much lower than the existing ambient noise within the project vicinity (45.7 to 61.6 dBA) as shown in Table 4.13-6. Thus, the proposed project would not result in noise impacts to nearby sensitive receptors from HVAC units, and the sensitive receptors would not be directly exposed to substantial noise from on-site mechanical equipment. Impacts in this regard would be less than significant.

Slow-Moving Trucks. On-site truck operations would be considered a mobile noise source subject to the City's noise regulations. It is anticipated that the project would operate 24 hours per day, seven days per week. Based on the *SCLA Lot 44 Proposed Non-Sort Facility ITE Trip Generation Table* (Trip Generation Study), prepared by Michael Baker International (March 2021), the proposed project would generate up to 616 truck trips per day, including 50 truck trips during the a.m. peak hour and 54 truck trips during the p.m. peak hour. Typically, slow-moving, heavy-duty delivery trucks accessing loading docks can generate a noise level of approximately 79 dBA at a distance of 50 feet.[3] These are noise levels generated by a truck that is operated by an experienced "reasonable" driver with typically applied accelerations. Higher noise levels may be generated by the excessive application of power. Lower levels may be achieved but would not be considered representative of a nominal truck operation.

For the purposes of this analysis, the distance to the nearest receptor was measured from the closest on-site truck-movement area (located approximately 100 feet east of the western project site boundary) to the property line of the nearest sensitive receptor. The nearest sensitive receptor (i.e., a residence to the southwest of the project site, in the City of Adelanto) would be located approximately 875 feet southwest of slow-moving trucks at the project site. At this distance, on-site noise levels from slow-moving trucks would be approximately 54 dBA. Therefore, noise levels from slow-moving truck activity on the project site would not exceed the normally acceptable land use compatibility threshold of 65 dBA CNEL for residential uses. It should be noted that slow-moving truck noise levels (i.e., 54 dBA) would be intermittent and would be much lower in the CNEL noise scale (i.e., the noise metric used by the Land Use Compatibility Guidelines to evaluate mobile noise impacts) which represents a time-weighted 24-hour average noise level based on A-weighted decibels. Therefore, slow-moving truck noise levels would not exceed the applicable noise standards at the nearest sensitive receptor, and a less than significant impact would occur in this regard.

Loading Docks. The project would include 98 loading docks along the northern and western sides of the distribution building. Loading docks would predominantly produce noise from back-up alarms (also known as back-up beepers). These back-up beepers are required to warn on-site workers that trucks are reversing. Back-up beepers produce a typical volume of 97 dBA at one meter (3.28 feet) from the source.[4] The property line of the nearest sensitive receptor (i.e., a residence to the southwest of the project site, in the City of Adelanto) would be located approximately 1,000 feet southwest of the closest loading dock located on the southwest side of the distribution building. At this distance, exterior noise levels from back-up beepers would be approximately 47 dBA. Therefore, the anticipated noise levels

[2] U.S. Environmental Protection Agency, *Community Noise*, 1971.
[3] Elliot H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.
[4] Environmental Health Perspectives, Vehicle Motion Alarms: Necessity, Noise Pollution, or Both? https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/, accessed April 22, 2021.

from back-up beepers would not exceed the City of Adelanto's residential noise threshold (i.e., 65 dBA). Impacts would be less than significant in this regard.

Parking Areas. A total of 396 trailer parking stalls and 1,010 passenger car parking stalls would be provided for delivery trucks, employees, and visitors in surface parking lots located along the distribution building perimeters. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to nearby noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in Table 4.13-11, *Typical Noise Levels Generated by Parking Lots*.

Table 4.13-11
Typical Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	63 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	61 dBA L_{eq}
Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.	

It should be noted that parking lot noise levels are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower than what is identified in Table 4.13-11. As shown in Table 4.13-11, parking lot noise levels would range from 61 to 63 dBA at a distance of 50 feet. The property line of the nearest sensitive receptor (i.e., a residence to the southwest of the project site, in the City of Adelanto) would be located approximately 830 feet southwest of the nearest proposed parking area on southwestern portion of the project site. At this distance, parking lot noise levels would range between 30 to 46 dBA. Therefore, noise levels from parking activities on the project site would not exceed the normally acceptable land use compatibility threshold of 65 dBA CNEL for residential uses and impacts would be less than significant.

Mitigation Measures:

NOI-1 Prior to issuance of any Grading Permit, the project applicant shall submit a Grading Plan for review and approval by the City Engineer, which stipulates the following:

- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers, to the satisfaction of the Development Department.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers, to the satisfaction of the City Engineer.
- During construction and to the satisfaction of the Development Department, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors during construction activities.
- Construction activities that produce noise within 550 feet of the Adelanto City Limit shall not take place outside of the allowable hours specified by the City of Adelanto Municipal Code Section 17.90.020(d)(1).

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

Less Than Significant Impact. Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibration from construction activities rarely reach levels that damage structures.

Significance thresholds concerning construction vibration levels have not been adopted by the City of Victorville. However, the City of Adelanto has adopted a groundborne vibration threshold of 0.2 inch-per-second peak particle velocity (PPV) measured at the subject property line; refer to Adelanto Municipal Code Section 17.90.030. Therefore, this analysis relies on the City of Adelanto and Federal Transit Administration (FTA) guidance regarding vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.20 inch-per-second) appears to be conservative. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Typical vibration produced by construction equipment is illustrated in Table 4.13-12, *Typical Vibration Levels for Construction Equipment*.

Table 4.13-12
Typical Vibration Levels for Construction Equipment

Equipment	Reference peak particle velocity at 25 feet (inches/second)	Approximate peak particle velocity at 70 feet (inches/second)
Large bulldozer	0.089	0.019
Loaded trucks	0.076	0.016
Small bulldozer	0.003	0.001
Vibratory Roller	0.210	0.045
Jackhammer	0.035	0.007

Notes:
1. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Guidelines*, September 2018. Table 12-2.
2. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 12-2 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
D = the distance from the equipment to the receiver

The highest degree of groundborne vibration during project construction would be generated during the paving phase due to the operation of a vibratory roller. The closest structures to the project site are single-family residences situated immediately west of the project site, within the City of Adelanto. Specifically, the structures would be located as close as 70 feet from the proposed Gateway Drive improvements. As seen in Table 4.13-12, vibration velocities from vibratory roller operations would be approximately 0.045 inch-per-second PPV at 70 feet from the source of activity, which would not exceed the City of Adelanto and FTA's 0.2 inch-per-second PPV threshold. Therefore, groundborne vibration generated by construction activities on the project site would be less than significant.

Operational Vibration Impacts

Operation of the project would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. Heavy duty trucks would travel to and from the project site on surrounding roadways. According to the FTA, it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.[5] As such, it can be reasonably inferred that project operations would not create perceptible vibration impacts to the nearest sensitive receptors. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. The nearest airport to the project site is the Southern California Logistics Airport (SCLA), located immediately east of the project site. According to the CLUP, the project site is located in Compatibility Review Area 2 and 3. As shown in Table 4.13-1, the land use compatibility standards for warehouse operations are normally acceptable in Compatibility Review Area 2 and 3. Additionally, the proposed project would comply with applicable City of Victorville and SCLA Specific Plan noise requirements, including maximum permissible interior noise levels. Thus, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

[5] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

4.14 POPULATION AND HOUSING

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

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

Less Than Significant Impact. A project could induce population growth in an area, either directly (for example, by proposing new homes and/or businesses) or indirectly (for example, through extension of roads or other infrastructure). No residential uses would be developed as part of the project. The project would not result in the development of any new housing, and therefore the project would not induce direct population growth in the City through new housing development.

The proposed project would involve the construction of a distribution facility on vacant and undeveloped land and would employ approximately 850 people. The addition of a new distribution center on a previously vacant site would increase employment within the City. Thus, the project would lead to an increase in the daytime employee population within the area. The additional employment created by the proposed project has the potential to result in an indirect growth in the City's population, since the potential exists that future employees (and their families) that currently reside outside of the City could choose to relocate to the City. Estimating the number of future employees who may choose to relocate to the City would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Additionally, housing opportunities exist for the project's future employees in the communities surrounding the City.

Although uncertainty exists regarding the number of new employees who may choose to relocate to the City, it is not anticipated that implementation of the proposed project would induce substantial population growth within the City either directly or indirectly. The project does not eliminate a barrier to growth, but rather complies with the City's planned growth within the project area since it is consistent with the General Plan, zoning, and Specific Plan land use designations for the project site. As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is currently located on vacant, undeveloped land. There is no existing housing on-site. Project implementation would not displace any existing housing or persons; thus, would not necessitate the construction of replacement housing elsewhere. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

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

1) Fire protection?

Less Than Significant Impact. The City of Victorville Fire Department maintains six fire stations, with approximately 60 firefighters currently serving the City. Four of the six stations are equipped with at least one fire engine and three firefighters, with ten staff on-call if needed. Paramedics are provided at every fire station. Fire Station 319 is located at 18500 Readiness Street and provides fire protection services specifically related to SCLA operations pursuant to Federal Aviation Administration (FAA) requirements.[1] The closest fire station to provide fire protection and emergency services for non-airport portions of the project site is Fire Station 312, located approximately 5.1 miles southeast at 15182 El Evado Road.

The proposed project is not expected to require the construction of new or physically altered fire facilities. The proposed project would comply with the California Building Code (CBC) standards, which include site access requirements and fire safety standards. The project would also be subject to Victorville Fire Department review through the Site Plan Review process, to ensure adequate emergency access and fire safety features are provided as part of the project. Additionally, the project would comply with Municipal Code 16-5.01.080, *Development Impact Fee*, which would offset impacts of new development on the City of Victorville Fire Department resources. Upon payment of development fees and adherence to local and State regulations, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

[1] City of Victorville Fire Department. *Stations*. https://www.victorvilleca.gov/government/city-departments/fire/stations. Accessed February 26, 2021.

2) Police protection?

Less Than Significant Impact. The Victorville Police Department (VPD) provides law enforcement services to the City, with services contracted through the San Bernardino County Sheriff's Department. Victorville Police Department operations take place out of the Victorville Police Headquarters, located approximately 6.6 miles south of the SCLA Specific Plan area at 14200 Amargosa Road, as well as four satellite facilities. The staff of the Victorville Police Department works as a team comprised of multiple units. In addition to the Patrol and Detective units, the Department operates a gang detail, traffic detail, Multiple Enforcement Team, school resource officers, child protective services/adult protective services, and a reserve deputy unit.

The project proposes to construct a distribution facility on vacant land. The project would provide additional planned employment opportunities and could result in indirect population growth within the City that could result in additional demand for police protection services. However, it is not anticipated that long-term operation of the project would require new or physically altered police facilities, the construction of which could cause significant environmental impacts. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

3) Schools?

Less Than Significant Impact. The area surrounding the project site is served by the Adelanto Elementary School District (AESD) and the Victor Valley Union High School District (VVUHSD). AESD provides educational services for 8,671 students in grades K to 12, while VVUHSD provides educational services for 11,327 students in grades 7 to 12. The closest AESD school to the project area is Adelanto Elementary, located 0.9-mile southwest of the project site as 17931 Jonathan Street.[2] The closest VVUHSD to the project area is the Goodwill High School located approximately 6.3 miles southeast of the project site at 16350 Mojave Drive.[3] Excelsior Public Charter School's Aviation, Medicine, and Engineering (A.M.E.) Academy provides educational services to students in grades 7 to 12. Its North Victorville campus is located within the Specific Plan area at 18000 McCoy Circle Drive.

The project proposes to construct a distribution facility, which could result in indirect population growth within the City. However, the project would be subject to the requirements of AB 2926 and SB 50, which allows school districts to collect development impact fees to minimize potential impacts to school districts as a result of new development. Pursuant to SB 50, payment of fees to the applicable school district is considered full mitigation for project impacts, including impacts related to 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, or other performance objectives for schools. Thus, upon payment of development fees by the project applicant consistent with existing State requirements, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

4) Parks?

Less Than Significant Impact. Outdoor recreation resources in the City include public parks, public golf courses, public access lakes, bicycle paths and pedestrian trails, and ground-level linkages between recreation areas and urbanized places. According to the Victorville General Plan, the City currently maintains 198.4 acres of parkland. The City also maintains paseo systems within specific plan communities that link neighborhoods to local parks and to other neighborhoods. Norman Schmidt Memorial Park is located within the project area at 13576 Mustang Street, located 1.5 miles west of the project site. In addition, the Westwinds Sports Center and Westwinds Activity Center are also located approximately 1.5 miles west of the project site at 18241 and 18040 George Boulevard, respectively.

[2] Adelanto Elementary School District. *Schools*. https://www.aesd.net/Content2/schools. Accessed February 26, 2021.
[3] Victor Valley Union High School District. *Goodwill Education Center*. https://gec.vvuhsd.org/. Accessed February 26, 2021.

The project does not propose new or physically altered parks or recreational facilities. The proposed project is not expected to substantially impact the City's existing parks or recreational facilities. Although the project could indirectly increase population growth within the project vicinity, the potential increase is not anticipated to generate substantive additional demands for parkland or other recreational facilities. Additionally, the project would comply with Municipal Code Section 16-5.01.080, *Development Impact Fee*, which would offset impacts of new development on the City's parks and recreation facilities. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

5) Other public facilities?

Less Than Significant Impact. Other public services that could potentially be impacted by the proposed project include public libraries. Library services near the project area include the Adelanto Branch Library (ABL) and the City of Victorville Public Library (VPL). The ABL is located approximately 1.1 miles southwest of the project site,[4] and the VPL is located 6.8 miles southeast of the project site.[5] The proposed project is industrial in nature and would not result in impacts to public libraries. As noted above, the project would provide additional planned employment opportunities and could result in indirect population growth within the City that could result in additional demand for library services. However, it is not anticipated that long-term operation of the project would require new or physically altered library facilities, the construction of which could cause significant environmental impacts. Therefore, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

[4] City of Victorville, *City of Victorville Public Library* https://www.victorvilleca.gov/Home/Components/BusinessDirectory/BusinessDirectory/220/1054. Accessed February 26, 2021.
[5] San Bernardino County, Adelanto Branch Library, http://www.sbclib.org/LibraryLocations/AdelantoBranchLibrary.aspx. Accessed February 26, 2021

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4.16 RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b. 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?				✓

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?

Less Than Significant Impact. Refer to Response 4.15(a)(4). The proposed project would not result in a substantial increase in demand for parks or other recreational facilities and would not result in physical deterioration of these facilities. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.15(a)(4). The project does not include recreational facilities, nor would it require the construction or expansion of existing recreational facilities. No impacts would result in this regard.

Mitigation Measures: No mitigation is required.

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4.17 TRANSPORTATION

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

This section is based upon the *Technical Memorandum - Southern California Logistics Airport (SCLA) Lot 44 Distribution Center Project Vehicle Miles Traveled (VMT) Evaluation* (VMT Memorandum) prepared by Michael Baker International, dated April 16, 2021. The VMT Memorandum is provided as part of Appendix I, *Vehicle Miles Traveled Memorandum*.

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

Less Than Significant Impact.

Transit Services

Victor Valley Transit Authority (VVTA) provides bus transportation services (Route 32) to the project vicinity, and associated bus stops are located adjacent to the site along Barlett Avenue, Adelanto Road, and Air Expressway. It is anticipated that this bus route and associated bus stops would be maintained during project construction and upon project completion. Further, the Victor Valley Transportation Center (supporting bus and Amtrak service) and several park-and-ride lots exist in various locations of the City. The project would include the construction of a distribution center and associated roadway and utility improvements along Gateway Drive and Momentum Road. The project would not interfere with VVTA transit services or stops within the site vicinity, or affect the Victor Valley Transportation Center, during project construction and operation. Impacts in regard to transit services would be less than significant.

Roadways, Pedestrian, and Bicycle Facilities

According to the General Plan's *City of Victorville Non-Motorized Transportation Plan* (Non-Motorized Transportation Plan), no existing pedestrian or bicycle facilities are located on-site. Nonetheless, Air Expressway, located at the southern terminus of the proposed corridor along existing Gateway Drive, is shown as a Planned Regional Trail/ Path.

Implementation of the proposed distribution center development would not impair existing roads, pedestrian sidewalks, or future planned regional trail/path improvements along Air Expressway. Gateway Drive would generally be improved from a two-lane roadway to a four-lane major arterial with shared bike lanes, sidewalk, and curb and gutter installed on both the northbound and southbound sides of the roadway. South of the distribution center, the project includes a new alignment for Momentum Road extending from the southwestern corner of the distribution center to Adelanto

Road. The new corridor along Momentum Road would be a two-lane east-west roadway with a shared bike lane, sidewalk, and curb and gutter along the westbound travel lane (perimeter of the proposed distribution center) and asphalt concrete (AC) dike and landscaped parkway (grass) west of the distribution center and eastbound travel lane. Bicycle storage is also proposed on-site. Overall, the project would not result in impacts to any existing pedestrian or bicycle facilities. Additionally, roadway and pedestrian and bicycle facility improvements (refer to Section 2.4, *Project Characteristics*) associated with the project would be consistent with what is identified in the SCLA Specific Plan. Impacts in regard to pedestrian and bicycle facilities would be less than significant.

The proposed project would not result in significant impacts related to conflicts with a program, ordinance, or policy addressing the circulation system including the General Plan, Municipal Code regulations and standards. The project would be consistent with City standards including Municipal Code Title 15, *Buildings and Construction*, which adopts the California Building Code standards and regulations related to access and circulation, and would be subject to review by the Cityduring final design to ensure adherence to local requirements for internal site circulation and site access. As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact.

The project proposes to construct a 1,080,308-square foot distribution center within the western portion of the SCLA Specific Plan. To determine whether the project would consistent with CEQA Guidelines Section 15064.3, subdivision (b), the project was evaluated for consistency with the previously-prepared vehicle miles traveled (VMT) and traffic analysis associated with the SCLA Specific Plan Amendment. These documents consist of the *Southern California Logistics Airport Specific Plan Vehicle Miles Traveled (VMT) Assessment* (SCLA Specific Plan Amendment VMT Assessment), prepared by Michael Baker International, dated December 9, 2020 and the *SCLA Specific Plan Traffic Impact Analysis* (SCLA Specific Plan Traffic Analysis), prepared by Michael Baker International, dated December 21, 2020. Both of these documents included the proposed project site (i.e., Lot 44) within the analysis.

Table 4.17-1, *Lot 44 Project Trip Generation Comparison* provides a trip generation comparison of the assumptions made for Lot 44 in the SCLA Specific Plan Traffic Analysis and the proposed distribution center. As detailed in Table 4.17-1, the project is forecast to generate approximately 2,908 average daily trips, including 237 a.m. peak hour trip and 253 p.m. peak hour trips. As shown in Table 4.17-1, the proposed Lot 44 high-cube fulfillment center occupies approximately 66.4% of Lot 44 (72.2 out of 108.8 acres) and 49.1% of gross floor area (1,080,308 out of 2,200,000 square feet) assumed in the SCLA Specific Plan Traffic Analysis, while accounting for less than 30 percent of the daily trips and less than 20 percent of the peak hour trips that were assumed. While 33.6 percent of developable site area available remains for future development, there is remaining capacity for over 70 percent of the daily trips and over 80 percent of the peak hour trips. Even if a higher generating use (such as light industrial) were to occupy the remaining area of Lot 44, it is unlikely that the trips threshold assumed in the SCLA Specific Plan Traffic Analysis would be exceeded. Thus, it is anticipated that the project would reduce the overall trip generation assumed for Lot 44 within the SCLA Specific Plan Traffic Analysis.

Table 4.17-1
Lot 44 Project Trip Generation Comparison

Criteria		Assumptions for Lot 44 in the SCLA Specific Plan Amendment				Lot 44 Project	Difference	Percent Used (%)	Percent Remaining (%)
Land Use		Manufacturing	Light Warehouse	Light Industrial	Total SP Assumptions	High-Cube Fulfillment Center (Non-Sort)	-	-	-
Site Area	(acres)	-	-	-	108.8	72.2	37	66.4	33.6
Gross Floor Area	(square feet)	366,750	1,100,250	733,000	2,200,000	1,080,308	1,119,692	49.1	50.9
Daily Trips	(total PCE Trips)	2,106	2,800	5,321	10,227	2,908	7,320	28.4	71.6
AM Peak Hour Trips	(total PCE Trips)	334	273	750	1,357	237	1,121	17.4	82.6
PM Peak Hour Trips	(total PCE Trips)	362	304	674	1,340	253	1,087	18.9	81.1

Notes: PCE = passenger car equivalent
Source: Michael Baker International, *Technical Memorandum - Southern California Logistics Airport (SCLA) Lot 44 Distribution Center Project Vehicle Miles Traveled (VMT) Evaluation*, April 13, 2021; refer to Appendix G.

To evaluate whether the proposed project would have an effect on the findings of the SCLA Specific Plan Amendment VMT Assessment, consistency with the land use assumptions and trip generation were evaluated. As discussed above, the project is anticipated to reduce the overall trip generation for Lot 44, which may result in a decrease in the total VMT. Since a potential reduction in daily traffic and VMT are anticipated, the total VMT would be no greater than the findings in the SCLA Specific Plan Amendment VMT Assessment. A change in a project's scale can affect total daily traffic and total VMT but not necessarily the VMT/service population. For example, a warehouse project with 100 employees driving 50 miles to work would have the same VMT/employee as a warehouse project with 10,000 employees driving 50 miles to work. Thus, VMT/employee changes for Lot 44 would largely be based on the land uses previously/currently proposed, as well as differences in mix of land uses which may promote some internal trip capture (not applicable to the proposed land uses in Lot 44) or regional changes which support shorter trips (i.e. added residential in the area – also not applicable for Lot 44).

The Specific Plan Amendment land use for Lot 44 includes a total of 1,236 employees. The SCLA Lot 44 Project is estimated to have approximately 850 employees associated with a warehouse which is consistent with the land uses proposed in the Specific Plan Amendment i.e. warehouse, manufacturing and industrial. Since the SCLA Lot 44 project has less than 1,236 employees with similar land uses, it is not anticipated any changes to the findings of the VMT analysis for the SCLA Specific Plan Amendment VMT Assessment would occur. As the project is consistent with the land use assumptions in the Specific Plan Amendment and will generate fewer employee trips than anticipated in the Specific Plan Amendment, the findings of a less than significant transportation impact can also be found for the SCLA Lot 44 Distribution Center Project. Thus, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment). Rather, the project would include the construction of two roadways that would improve circulation within the project vicinity. Gateway Drive would be extended from its existing northerly terminus (adjacent to the Dr. Pepper/Snapple facility) to the northerly boundary of the distribution center site. In addition, a new east-west roadway, Momentum Road, would connect the new Gateway Drive extension to the east with Adelanto Road to the west. Momentum Road would be constructed along the southerly boundary of the distribution center site.

Project access would be provided along the new extension of Gateway Drive via four driveways and would be designed to be compatible with the City's existing circulation system. Momentum Road would provide two driveways, with the western driveway providing emergency vehicle access and the eastern driveway providing trailer truck outbound access. On-site trailer truck traffic circulation flows around the proposed distribution building, beginning at the northeastern driveway along Gateway Drive. Vehicular traffic would be restricted to the proposed eastern parking lot. All on- and off-site roadway and circulation improvements and emergency access features would be subject to City safety and design standards. As such, the project would not increase hazards due to a geometric design feature or incompatible use and no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact With Mitigation Incorporated. In conformance with City requirements, adequate emergency access would be provided to the project site. Secondary emergency access is proposed at the southwestern corner of the site along Momentum Road. An emergency vehicle access gate with knox box would be provided within the southeastern portion of the project site to allow access to the easterly portion of the project site from Momentum Road. The proposed access and circulation improvements would meet fire and other emergency access requirements as the City will conduct a Site Plan Review prior to issuing any permits per City standards.

The proposed project would require truck deliveries and off-site roadway improvements (e.g., along Gateway Drive and Air Expressway that may result in temporary impacts to circulation that could impede emergency access. Project construction activities could result in short-term temporary impacts to vehicular circulation. To address this temporary issue, Mitigation Measure TR-1 would be implemented. Mitigation Measure TR-1 would require implementation of a Construction Management Plan, which would include various provisions to ensure continuous and adequate emergency access during the construction process. With implementation of Mitigation Measure TR-1, impacts would be less than significant.

Mitigation Measures:

TR-1 Prior to issuance of any Grading or Building Permits, a Construction Management Plan for the proposed project shall be submitted for review and approval by the City of Victorville. The Construction Management Plan shall, at a minimum, address the following:

- Traffic control for any street closure, detour, or other disruption to traffic circulation.
- Identify the routes that construction vehicles would utilize for the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.), to access the site, traffic controls and detours, and proposed construction phasing plan for the project.

- Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.

- Require the project applicant to keep all haul routes clean and free of debris, including but not limited to gravel and dirt as a result of its operations. The project applicant shall clean adjacent streets, as directed by the City of Victorville City Engineer (or representative of the City Engineer), of any material which may have been spilled, tracked, or blown onto adjacent streets or areas.

- Hauling or transport of oversize loads shall be subject to the requirements of the City and/or the adjacent jurisdictions.

- Haul trucks entering or exiting public streets shall at all times yield to the public traffic.

- If hauling operations cause any damage to existing pavement, streets, curbs, and/or gutters along the haul route, the project applicant shall be fully responsible for repairs. The repairs shall be completed to the satisfaction of the City of Victorville City Engineer.

- All constructed-related parking and staging of vehicles shall be kept out of the adjacent public roadways and shall occur on-site or within the identified construction staging areas.

- This Plan shall meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD) as well as City of Victorville requirements. The traffic control plans (TCP) shall be prepared by the contractor and submitted to the City Engineer for approval pertaining to off-site work, including sidewalk construction, building façade, underground utilities, and any work that would require temporary curb lane closures. The plan shall be developed according to the MUTCD (latest edition) guidelines, including plans for traffic signs, traffic cone arrangements, and flaggers to assist with pedestrian and traffic.

- Should the project utilize State facilities for hauling of construction materials, the Construction Management Plan shall be submitted to the California Department of Transportation (Caltrans) for review and comment.

- Should project construction activities require temporary vehicle lane, bicycle lane, and/or sidewalk closures, the project applicant shall coordinate with the City Engineer regarding timing and duration of proposed temporary lane and/or sidewalk closures to ensure the closures do not impact operations of adjacent uses or emergency access.

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4.18 TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) 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			✓	
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

The analysis of cultural resources is partially based upon the *Cultural Resources Identification Report for the Southern California Logistics Airport Lot 44 Warehouse Project, City of Victorville, San Bernardino County, California (Cultural Resources Report) prepared by Michael Baker (dated April 9, 2021); refer to Appendix C, Cultural Resources Report*.

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called tribal cultural resources. Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

As required under AB 52, the City of Victorville distributed letters to tribes that had previously requested to be notified of projects subject to CEQA. The letters provided a description of the project, and notified each tribe of the opportunity to consult with the City regarding the proposed project. As of the conclusion of the 30-day tribal response period under AB 52, only the San Manuel Band of Mission Indians provided a response to the City.

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

1) 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

Less Than Significant Impact. Refer to Response 4.5(a). Based on the Cultural Resources Report prepared for the project, two cultural resources are located onsite:

George Air Force Base (P-36-025787/CA-SBR-016313H). The air force base was recorded in 2012. The recordation identifies the resources boundaries and provides a brief history. It has not been evaluated for inclusion in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register of historical resources. Therefore, impacts to this resource would not be significant.

Facility 811 (P-36-015466). Facility 811, located on an abandoned runway on the former George Air Force Base, was constructed in 1954. It is a reinforced concrete and timber structure that measures 40 feet in height, 40 feet 4 inches in width, and 58 feet 10 inches in length. The interior and southeast façade displays timber cladding and an open bay filled with an earthen mound. The earthen mound was intended to contain live ammunition fire from military aircraft. The structure displays an external structural concrete support system. Originally, the structure had two 100-foot timber wing walls and a massive surrounding earthen abutment necessary for its use as a firing wall. In 2010, the wing walls and earthen abutment were removed. In 1991, preempting the closure of George Air Force Base, Facility 811 was evaluated and recommended eligible for the NRHP under Criterion Consideration G for exceptional significance and ultimately determined ineligible for the NRHP. It was subsequently listed in OHP's BERD with a 6Y status (ineligible for the NRHP, not evaluated for State or local significance).

Facility 811 has not been reevaluated since reaching 50 years of age. As such, Michael Baker evaluated it for inclusion in the CRHR as part of the Cultural Resources Report. The Cultural Resources Report noted that Facility 811 maintains integrity of location and setting, but lacks integrity of design, materials, workmanship, feeling, and association because it no longer displays the important features (earthen abutment and timber wing walls) that would justify its inclusion in the CRHR. The structure, therefore, lacks integrity. The Cultural Resources Report concluded Facility 811 is not eligible for listing in the California Register under any criteria due to lack of integrity.

The George Air Force Base and Facility 811 were determined not eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) that would be affected by the project. Thus, impacts to historic resources would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. As discussed in Response 4.18(a)(1), above, based on the Cultural Resources Report, no tribal cultural resources that meet the criteria under the AB 52 have been identified within the project area. However, during the tribal consultation process, the San Manuel Band of Mission Indians notified the City that the proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. In the event that previously unknown tribal cultural resources are encountered during earth disturbing activities, the San Manuel Band of Mission Indians requested the inclusion of Mitigation Measures CUL-1 and TCR-1. Mitigation Measure CUL-1 would require that potentially affected tribes (including the San Manuel Band of Mission Indians) be contacted in the event cultural resources are discovered during ground moving activities

associated with the project. If the find is deemed significant, a cultural resources Monitoring and Treatment Plan would be prepared by the project archaeologist, in coordination with the affected tribe(s). The Plan would allow for tribal monitoring to occur for the duration of ground disturbing activities. Mitigation Measure TCR-1 would require archaeological and cultural documents prepared as part of the project be supplied to the City for dissemination to the affected tribe(s). The City would consult with the affected tribe(s) to minimize potential impacts to tribal cultural resources. Upon implementation of these mitigation measures, potential impacts to unknown tribal cultural resources that may underlie the project site would be reduced to less than significant levels.

Mitigation Measures: In addition to the Mitigation Measure provided below, refer to Mitigation Measure CUL-1 within Section 4.5, *Cultural Resources*.

TCR-1 Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the project applicant and City of Victorville for dissemination to potentially affected Native American tribes, including the San Manuel Band of Mission Indians. The City and/or project applicant shall, in good faith, consult with the applicable tribe(s) to minimize potential impacts to tribal cultural resources.

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4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?			✓	

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

Less Than Significant Impact.

Water

The proposed project would entail the construction and development of a warehouse distribution facility on vacant land, thus, resulting in the construction of new pipelines and utilities to accommodate the new development and water demand on-site. The project would install a domestic water connection to connect to the City's existing infrastructure that exists near the southeastern corner of the distribution facility site, along the proposed extension of Gateway Drive. The water main would be extended to the northerly boundary of the distribution center site, within the proposed extension of Gateway Drive. Numerous laterals would extend from the water main towards the west, to serve the site for domestic and fire protection services. These impacts would occur within the boundaries of the project site, the effects of which have been analyzed within this Initial Study. As such, less than significant impact would occur in this regard.

Wastewater

As mentioned above, the proposed project would entail the construction and development of a warehouse distribution facility on vacant land, requiring new pipelines and utilities to accommodate the proposed new development and associated wastewater generation. An existing 21-inch vitrified clay pipe (VCP) sewer main exists along the eastern boundary of the distribution center site, within the proposed extension of Gateway Drive. The project would construct numerous sewer laterals from this existing VCP sewer main to serve the project. These impacts would occur within the boundaries of the project site, the effects of which have been analyzed within this Initial Study. As such, less than significant impact would occur in this regard.

Stormwater

The proposed project would include the development of new facilities on what was previously vacant land. The project would include infiltration basins and a stormwater pipeline network to convey the anticipated stormwater runoff to the northerly portion of the distribution center site. According to the *Preliminary Hydrology Report* (Hydrology Report), the proposed infiltration basins would retain and treat the project's Design Capture Volume (DCV). These stormwater facilities and associated impacts would occur within the boundaries of the project site, the effects of which have been analyzed within this Initial Study. As such, are less than significant impacts would occur in this regard.

Dry Utilities

The City of Victorville Municipal Utility Services (VMUS) and Southern California Edison (SCE) would provide natural gas and electrical services to the project site, respectively. The project would involve relocating the existing overhead electric lines that traverse the site. The project would involve constructing new private on-site dry utility lines a new transformer on-site to serve the proposed warehousing uses. Payment of standard utility connection fees and ongoing user fees to VMUS and SCE would be required to ensure these utility services would be able to accommodate the proposed development. Construction of the project's dry utilities would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations. These dry utilities and associated impacts would occur within the boundaries of the project site, the effects of which have been analyzed within this Initial Study. As such, project impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Domestic water service to the project site is provided by the Victorville Water District (District). In order to analyze whether sufficient water supply is available to serve the project, the City prepared the *Draft Water Feasibility Study* for the proposed project dated May 14, 2021. The analysis included an examination of the project's anticipated water demand in relation to the District's available supply. Water demand associated with the project is shown below in Table 4.19-1, *Project Water Demand*.

The project water demand was then compared to the District's available supply. The District's current water supply consists of 34 active wells, which pump from the Upper Mojave Groundwater Basin, and two turnouts from the Mojave Water Agency's Regional Recharge and Recovery Project (R^3), which pump from a seasonal storage aquifer that is recharged with imported water.

Table 4.19-1
Project Water Demand

Demand Condition	Water Demand
ADD (gpd)	45,800
ADD (gpm)	31.8
MDD Peaking Factor	1.4
MDD=ADD x MDD Peaking Factor (gpd)	64,000
MDD (gpm)	44.4
PHD Peaking Factor	1.7
PHD=ADD x PHD Peaking Factor (gpd)	78,000
PHD (gpm)	54.2

Source: WSC, *Draft Water Feasibility Study*, May 14, 2021.
ADD=average daily demand; MDD=maximum daily demand; PHD=peak hour demand; gpd=gallons per day; gpm=gallons per minute

Available supply for the project was evaluated on the basis of total system firm capacity. The 2021 WMP calculated firm capacity with the two largest wells and the R^3 supply being out of service. With these facilities out of service, the firm capacity of the system is 31,903 gpm. The District's 2021 Water Master Plan (WMP) supply criteria state that firm capacity should be greater than MDD. The current system MDD as of 2020 is 24,764 gpm; this includes estimated demands for proposed projects which have been previously evaluated based on the City of Victorville 2010 WMP and the 2021 WMP and approved, but not yet constructed. Note that projects evaluated prior to the adoption of the 2010 WMP are not included in this total. Therefore, there is a current system wide firm capacity surplus of 7,139 gpm. The addition of the proposed project would decrease this surplus to 7,095 gpm. The firm capacity analysis shows that the system currently has sufficient firm capacity to meet the MDD. Table 4.19-2, *Water Supply Analysis*, outlines the supply analysis for serving the project.

Table 4.19-2
Water Supply Analysis

Condition	Value
Proposed Project, MDD (gpm)	113.2
Firm Capacity (gpm)	31,903
Current MDD (gpm)	24,764
MDD Supply Required for Approved Projects (gpm)	3,131
Current Surplus/(Deficit) (gpm)	7,139
Proposed System Surplus/(Deficit) + Project MDD (gpm)	7,095
Is Available System Wide Supply Sufficient?	**YES**

Source: WSC, *Draft Water Feasibility Study*, May 14, 2021.

In addition, the proposed project and its demands are included in the Water Supply Assessment (WSA) prepared as part of the SCLA Specific Plan Amendment Subsequent Program Environmental Impact Report (EIR). The WSA was completed by WSC in June 2020. The WSA determined that the District has sufficient water supplies available during average, single dry, and multiple dry water years during the next 20-years to meet the projected water demand for all of the developments within the SCLA Specific Plan, which includes the proposed project.

Based on the analysis provided within the Draft Water Feasibility Study prepared for the proposed project, and the WSA prepared as part of the SCLA Specific Plan Amendment Subsequent Program EIR, adequate water supply would be available to the serve proposed project and reasonably foreseeable future development, and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Wastewater associated with the proposed project would be conveyed to the SCLA Industrial Wastewater Treatment Plant, located approximately two miles northeast of the project site. According to the City of Victorville Sewer Master Plan, the SCLA Industrial Wastewater Treatment Plant has a total treatment capacity of 2.5 MGD and processed an average flow of 1.39 MGD in 2015. Based on land uses included in the City's 2008 General Plan, the Sewer Master Plan determined that buildout of the SCLA Specific Plan would generate 0.73 MGD of wastewater in 2040. To accommodate this increase, the Sewer Master Plan recommends a capacity improvement for a sewer main identified as "Project No. C34 (Parallel Pipe Option)" under 2040 conditions. No improvements to the SCLA Industrial Wastewater Treatment Plant were determined to be necessary under existing or future (2040) conditions. It is the City's policy to ensure development pays the cost of its infrastructure and services needs (Land Use Element Policy 3.1.1) and require new development to pay the capital costs of public facilities and services needed to serve those development (Land Use Element Implementation Measure 3.1.1.4). In conformance with Land Use Element Policy 3.1.1, the project applicant would be responsible for payment of applicable development impact fees to pay for infrastructure improvements as identified in the City's Capital Improvement Plan. As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. According to the General Plan, non-hazardous solid and liquid waste generated in the City is currently deposited in the Victorville Landfill, which is located northeast of the City at 17080 Stoddard Wells Road.

Construction

All construction activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." AB 939 requires that at least 50 percent of waste produced is recycled, reduced, or composted. Local jurisdictions, including the City of Victorville, are monitored by the State (CalRecycle) to verify if waste disposal rates set by CalRecycle are being met that comply with the intent of AB939. As of the latest data available (2018), the City has met the target rates set by CalRecycle.[1]

The project would also be required to demonstrate compliance with CALGreen, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Compliance would be verified by the City through review of project plans and specifications. Lastly, the project would be subject to compliance with all applicable solid waste handling, processing, and disposal requirements stipulated under Chapter 6.36 of the Victorville Municipal Code. Compliance with these programs and policies would ensure the project's construction-related solid waste impacts are less than significant.

Operation

Based on information provided by CalREcycle, Victorville Landfill has a maximum daily throughput of 3,000 tons per day and a remaining capacity of 79,400,000 cubic yards. Based on the project's air quality and GHG modeling, project

[1] CalRecycle. *Jurisdiction Diversion/Disposal Rate* Summary. https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006, accessed April 10, 2021.

operations are expected to generate approximately 113.6 tons of waste per year, or approximately 0.31 tons per day (tpd); refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*. This represents a nominal 0.9 percent of the maximum tons per day accepted by Victorville Landfill As such, the project is not anticipated to generate solid waste in excess of State or local standards (such as waste disposal targets established under AB 939), or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant in this regard.

Table 4.19-3
Landfills Serving the City

Landfill/Location	Amount Disposed by City in 2019 (tons/day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
El Sobrante Landfill 10910 Dawson Canyon Road Corona, CA 91719	1,212	16,054	143,977,170	01/01/2051
Mid-Valley Sanitary Landfill	3,384	7,500	61,219,377	04/01/2045
Victorville Sanitary Landfill	103,159.2	3,000	79,400,000	10/01/2047
Notes: Antelope Valley Public Landfill, Azusa Land Reclamation Co. Landfill, Badlands Sanitary Landfill, Barstow Sanitary Landfill, Chemical Waste Management, Inc.Unit B-17, Chiquita Canyon Sanitary Landfill, Frank R. Bowerman Sanitary LF, Lamb Canyon Sanitary Landfill, Lancaster Landfill and Recycling Center, McKittrick Waste Treatment Site, Olinda Alpha Landfill, San Timoteo Sanitary Landfill, Simi Valley Landfill & Recycling Center, and Southeast Resource Recovery Facility are excluded from Table 4.19-1 as these facilities accepted less than one percent of the City's solid waste in 2019 (the last available reporting year).				
Source: CalRecycle, *SWIS Facility/Site Search*. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search. accessed April 10, 2021.				

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Refer to Response 4.19(d), above. The proposed project would comply with all Federal, State, and local statutes (including AB 939) and regulations related to solid waste management and reduction during construction and operations. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

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

No Impact. The project site is not located in or near a State Responsibility Area, nor is the site designated as a Very High Fire Hazard Severity Zone. Additionally, the project would comply with all local regulations related to emergency access/evacuation. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

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?

No Impact. As noted in Response 4.20(a), the project is not located within or near a State Responsibility Area or Very High Fire Hazard Severity Zone. The Fire Hazard Severity Zone (FHSZ) is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and

very high). Given the low fire risk and relatively flat topography of the project site and surrounding area, the risk of post-fire flooding, runoff, slope instability, and drainage changes are considered low. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
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?		✓		

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in Section 4.4, *Biological Resources*, the project would not result in impacts to special-status plant species, since none were observed on-site and the special-status species identified in the records search results are not expected to occur within the project site. One special-status wildlife species was observed within the project site during the field survey: California horned lark. In addition, two loggerhead shrikes were observed within the northern portion of the project site. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, it was determined that the project site has a moderate potential to support BUOW, and a low potential to support Cooper's hawk, Townsend's big-eared bat, and prairie falcon. All remaining special-status wildlife species identified by the records search are not expected to occur within the project site. To minimize impacts in this regard, Mitigation Measures BIO-1 through BIO-4 have been incorporated. Thus, impacts to biological resources would be less than significant.

As described within Sections 4.5, *Cultural Resources* and 4.18, *Tribal Cultural Resources*, there were no resources found on-site that were determined eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR), and no archaeological resources were observed on-site. Should an unexpected resource be uncovered during the grading and excavation process, implementation of Mitigation Measures CUL-1 and TCR-1 would reduce potential impacts to unknown cultural resources. Thus, impacts in this regard would be less than significant.

As discussed within Section 4.7, *Geology and Soils*, the project site is mapped at the ground surface as Holocene-age deposits (Qa, Qf, Qyf) and artificial fill that were assigned a ranking of low potential for paleontological sensitivity. However, high potential deposits, such as Pleistocene-age or older (Qoa, Qoam), are likely present below the surficial

Holocene-age deposits and artificial fill at unknown depths within the project site. As such, Mitigation Measure GEO-1 which includes a requirement for a paleontological resource mitigation and monitoring program (PRMMP), which would include procedures for construction monitoring and a protocol for fossil discoveries and the subsequent treatment of fossils. With Mitigation Measure GEO-1 implemented, impacts in this regard would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is currently undeveloped and vacant. The project is not anticipated to result in substantial population growth within the area, either directly or indirectly. Although the project may incrementally affect other resources that were determined to be less than significant, the project's contribution to these effects is not considered "cumulatively considerable," in consideration of the relatively nominal impacts of the project and mitigation measures provided. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

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

Less Than Significant Impact With Mitigation Incorporated. Previous sections of this Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, geology and soils, GHG, hydrology/water quality, noise, hazards and hazardous materials, and other issues. As concluded in these previous discussions, the proposed project would result in less than significant environmental impacts with implementation of the recommended mitigation measures. Therefore, the proposed project would not result in environmental impacts that would cause substantial adverse effects on human beings.

4.21 REFERENCES

The following references were utilized during preparation of this Initial Study. These documents are available for review at the City of Victorville Development Department, located at 14343 Civic Drive, Victorville, California 92392, and on the associated website as indicated below, if available.

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5.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, we recommend that the City of Victorville prepare a mitigated negative declaration for the SCLA Lot 44 Distribution Center Project. We find that the proposed project could have a significant effect on a number of environmental issues, but that mitigation measures have been identified that reduce such impacts to a less than significant level. We recommend that the second category be selected for the City of Victorville's determination (see Section 6.0, *Lead Agency Determination/Mitigated Negative Declaration*).

May 2021
Date

Alan Ashimine, Project Manager
Michael Baker International

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6.0 LEAD AGENCY DETERMINATION/MITIGATED NEGATIVE DECLARATION

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION has been prepared. ☒

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature: _____

Title: Senior Planner

Printed Name: Mike Szarzynski

Agency: City of Victorville

Date: May 2021

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