# INITIAL STUDY
# FOR TENTATIVE TRACT MAP (TTM) 20500, 210-LOT SINGLE-FAMILY RESIDENTIAL PROJECT

Prepared for:

**City of Victorville**
Development Department
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## LIST OF ABBREVIATIONS AND ACROYNMS

| | |
|---|---|
| AAQS | Ambient Air Quality Standards |
| amsl | above mean sea level |
| APE | Area of Potential Effect |
| APN | Assessor Parcel Number |
| AQMD | Air Quality Management District |
| AQMP | Air Quality Management Plan |
| ARB | Air Resources Board |
| BACMs | Best Available Control Measures |
| BMPs | Best Management Practices |
| BRA | Biological Resources Assessment |
| BUOW | Burrowing Owl |
| CAAA | Clean Air Act Amendment |
| CAAQS | California Ambient Air Quality Standards |
| CARB | California Air Resources Board |
| CBC | California Building Code |
| CCAR | California Climate Action Registry (now called Climate Action Reserve) |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CESA | California Endangered Species Act |
| CNEL | Community Noise Equivalent Level |
| CO | Carbon Monoxide |
| $CO_{2e}$ | Carbon Dioxide equivalent |
| CWA | Clean Water Act |
| dB | decibel |
| dBA | A-weighted decibel |
| DIF | Development Impact Fee |
| DP | Development Permits |
| DTSC | Department of Toxic Substances Control |
| EA | Environmental Assessment |
| EPA | Environmental Protection Agency |
| ESA | Endangered Species Act |
| FGC | Fish & Game Code |
| FTA | Federal Transit Association |
| GCC | Global Climate Change |
| GHG | Greenhouse Gas |
| ITP | Incidental Take Permit |
| LMAD | Landscape Maintenance Assessment District |
| LST | Localized Significance Thresholds |
| LUST | Leaking Underground Storage Tank |
| MBTA | Migratory Bird Treaty Act |
| MDAB | Mojave Desert Air Basin |
| MDAQMD | Mojave Desert Air Quality Management District |
| MM | Mitigation Measure |

| | |
|---|---|
| MND | Mitigated Negative Declaration |
| NAAQS | National Ambient Air Quality Standards |
| NOx | Oxides of Nitrogen |
| NPDES | National Pollutant Discharge Elimination System |
| $PM_{10}$ | particulate matter less than 10 micrometers in diameter |
| $PM_{2.5}$ | particulate matter less than 2.5 micrometers in diameter |
| ROG | Reactive Organic Gases |
| RWQCB | Regional Water Quality Control Board – Lahontan Region |
| SBCFD | Victorville Fire Department, San Bernardino County |
| SBDC | San Bernardino Development Code |
| SCAG | Southern California Association of Governments |
| SCE | Southern California Edison |
| SCLA | Southern California Logistics Airport |
| SIP | State Implementation Plan |
| SOx | Oxides of Sulfur |
| SRA | State Responsibility Area |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Resources Control Board |
| TRC | Tribal Cultural Resources |
| TTM | Tentative Tract Map |
| USDA | U.S. Department of Agriculture |
| USEPA | U.S. Environmental Protection Agency |
| USFWS | U.S. Fish and Wildlife Service |
| USGS | U.S. Geological Survey |
| UWMP | Urban Water Management Plan |
| VdB | vibration-velocity decibel |
| VESD | Victorville Elementary School District |
| VMT | Vehicle Miles Traveled |
| VOC | Volatile Organic Compounds |
| VVUHSD | Victor Valley Union High School District |
| VVWRA | Victor Valley Wastewater Reclamation Authority |
| VWD | Victorville Water District |
| WEAP | Worker Education Awareness Program |
| WQMP | Water Quality Management Plan |

# ENVIRONMENTAL CHECKLIST FORM

## INTRODUCTION

1. Project Title: TTM 20500, 210-Lot Single-Family Residential Project

2. Lead Agency Name: City of Victorville, Development Department
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6. Contact: Bruce Wilson
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7. Project Location: The proposed project is located on the south side of Seneca Road between Cantina Drive (proposed road) and Mesa Linda Ave (proposed Road), designated as APN 3103-551-05 in the City of Victorville, San Bernardino, California. The site is located in Township 5 North, Range 5 West, Section 22 as found on the USGS *Adelanto* Quadrangle, 7.5 Minute Series topographic map. The geographic coordinates are as follows: 34.51232, -117.39322 (refer to Figures 1 and 2 for project location depicted at a regional and site level). Figure 3 is a copy of the TTM 20500 map and Figure 4 is an aerial photograph of the project site and surrounding area.

## 8. Project Description

### A. Introduction

This document is being prepared for the City of Victorville for the consideration of revised Tentative Tract Map (TTM) 20500 to develop a 210-Lot Single-Family Residential Subdivision to be located within an approximately 60-acre parcel along the southwest corner of Mesa Linda Ave and Seneca Road, known as APN 3103-551-05. The original Tentative Tract Map 16681 was approved in 2006 and has expired.

In a May 2021 pre-application meeting to resubmit the TTM, the City indicated that the formerly approved TTM should be revised to include the following general concepts:

- More use of include curvilinear streets and cul-de-sacs;
- Reduction of through streets;
- Use of paseos and parkways to promote walkability and community gathering space;
- Use of dual-use drainage basin/recreational amenities;
- No lots will front Begonia Road but rather will be internalized within the tract and buffered with a 10-ft Landscape Maintenance Assessment District (LMAD) lot along the Begonia Road.

The tract map has been undergoing redesign since October 2021 per the City's instructions. The purpose of the project is to provide additional housing options to serve the growing population of the City of Victorville. The original project TTM 16681 has been renamed TTM 20500.

## B. Project Characteristics

The approximately 60-acre Project site will be graded in accordance with the TTM 20500 which seeks to delineate 210 residential lots that are approximately 7,200 square feet (sf) each, as well as the associated roadways and utility infrastructure. Each of the lots face the interior roadways. At this time, it is assumed that individual lots will be sold to private parties to construct individual residences.

Main roadways will be paved and developed along the exterior as follows: Mesa Linda Avenue on the east, Seneca Road on the north, Cantina Drive on the west, and Begonia Road on the south. The main ingress and egress to the subdivision will be from either of two entrances along Seneca Road, one entrance off of Mesa Linda, and two from Begonia Road. The interior subdivision uses curvilinear streets and cul-de-sacs.

The Project site is relatively flat and will be graded to ensure stormwater runoff patterns follow existing drainage courses or be carried in proposed streets. Two stormwater basins are planned, primarily along the northern property boundary, adjacent to Seneca Road.

The project proposes a landscaping area in accordance with City requirements. A 7-foot-wide to 10-foot-wide landscape buffer is planned between the lots and each of the perimeter roads. These landscaped buffer areas will be dedicated as a Landscape Maintenance Assessment District (LMAD), which will be maintained as part of the project.

### Road Improvements

The regional storm drain facility, identified as Line E-01-1, is proposed to be installed along Seneca Road on the north boundary, and E-01 is proposed for Mesa Linda Avenue on the east boundary. Once the subdivision is constructed, the subdivision will be annexed into a Drainage Facilities Assessment District for the proposed drainage improvements.

Off-site improvements that will be completed as part of the project include adjacent roads and extension of utilities onto the property from adjacent roadways. The project will connect to electricity. water, sewer, natural gas, and telecommunication adjacent to the project site.

Should the developer decide to construct custom homes, these homes must have a solar component or be solar ready, and must be outfitted with low flow toilets and energy efficient appliances. Additionally, reclaimed water will be utilized for peripheral landscaping if available.

**List of All Applications**

1. The project will require a Minor Site Plan approval in the future for dual use basin designs and the housing product approval.
2. The environmental assessment is prepared in conjunction with the project application. Initial Study/Mitigated Negative Declaration (MND): Required for CEQA compliance.

**Construction Scenario**

The anticipated construction sequence is as follows, but may be adjusted to conform to specific conditions at the time of actual construction:

1. Clear and grub;
2. Preparation of subgrade;
3. Mass-grade site and parking areas;
4. Installation of the storm drain system;
5. Installation of public sewer system;
6. Installation of public water system;
7. Fine grade to prepare for surface improvements;
8. Install landscaping; place final lift of asphalt/concrete;
9. Install signage and striping;
10. Install private utilities, including water quality infrastructure; and
11. Install curb, gutters, sidewalks and first asphalt lift.

If lots are sold and individual buyers install their own homes or if the developer installs new homes, the following will occur:

1. Installation of building foundations and parking areas, and
2. Complete construction of buildings.

Most of the preceding construction activities are self-explanatory. Construction of the tract site will be completed in closely spaced, sequential phases with the entirety of the horizontal construction to be completed first. This will include clearing and grubbing, grading and installation of utilities, and will include development of internal paved areas. Once the horizontal improvements are completed, the Applicant will either begin to sell lots or will develop the site with homes for sale. This pattern of development will continue until the site has been completed. Construction should be initiated in mid- to late-2024 and the project should open for occupancy in late-2024. Construction details are further discussed in the Air Quality evaluation in Appendix 1. It is anticipated that between 20 and 30 construction workers will be on site at any given time during construction. Please note that all proposed mitigation measures identified in this document are fully incorporated into the Project Mitigation Monitoring and Reporting Program.

**9. Description of the Project Site**

The project site is square parcel of land that is generally located approximately 700 feet from Hwy 395 along Seneca Road, an unimproved road. The site is bounded on the north by Seneca Road, on the east by Mesa Linda Ave, an unimproved road, to the west by vacant land and to the south by Begonia Road, an unimproved road. A Southern California Edison powerline easement bisects the far eastern edge of the site. The project site ranges in elevation from approximately 3,105 feet above mean sea level (msl) in the southwest corner of the property to approximately 3,078 feet

msl in the northeast corner, and the site contains moderately to heavily disturbed native vegetation with several disturbed pathways throughout the site from off-road disturbance.

**10. Surrounding Land Uses**

North: Seneca Road and Vacant Land: the area north of the project is vacant.
South: Begonia Road, vacant land and Walmart: The site is bounded by the unimproved Begonia Road; south of Begonia Road is a Walmart that fronts Hwy 395, and vacant parcels to the east of the Walmart.
West: Vacant Land: the area east of the project site is vacant.
East: Utility and Vacant: The eastern boundary is Mesa Linda Road, an unimproved road, and a Southern California Edison powerline, which runs in a northwesterly direction. A solar farm exists approximately 700 feet to the west of the Project site's eastern boundary.

**11. General Plan Designation**

Existing: Single-Family Residential
Proposed: No change in General Plan designation proposed

**12. Zoning**

Existing: Single-Family Residential
Proposed: No change in zone classification proposed

**13. Other Agencies whose approval may be required**

Based on an evaluation of the specific project location, the proposed project may require permits from other agencies to support development of the site as proposed by the Owner applications. The amount of area to be disturbed by the whole project will be greater than one acre; therefore, the developer will be required to file a Notice of Intent (NOI) for a General Construction permit to comply with the National Pollutant Discharge Elimination System (NPDES) requirements. The NOI is filed with the State Water Resources Control Board and enforced by the Lahontan Regional Water Quality Control Board. A Stormwater Pollution Prevention Plan (SWPPP) must be implemented in conjunction with construction activities. It is possible that a California Endangered Species Act (CESA) incidental take permit will be required to remove or otherwise handle onsite Joshua Trees. No other permits or agency requirements have been identified in association with the proposed project.

**14. Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?** No.

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

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

**DETERMINATION** (To be completed by the Lead Agency)

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

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

Tom Dodson & Associates — Prepared by

January 2023 — Date

Travis Clark — Lead Agency (signature)

Digitally signed by Travis Clark
DN: C=US, E=tclark@victorvilleca.gov, CN=Travis Clark
Date: 2023.12.20 09:28:05-08'00'

December 20, 2023 — Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

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

9) The explanation of each issue should identify:

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

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

SUBSTANTIATION

a. *Less Than Significant Impact* – Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. A review of the TTM 20500 site determined that there are no scenic vistas/values located internally within the area proposed for the development of the proposed project. The project site is located adjacent to and northeast of an existing Walmart store; east of Highway 395; and west of an existing solar field; with typical high desert open space to the north. Refer to the aerial photo in Figure 4. The remaining vacant Mojave-desert habitat west and north of the site contains the same vegetation that is currently found within the project site. The development of the TTM 20500, Single-Family Residential Project will not impact any important scenic vistas/values within the project area.

   A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the existing view to a scenic vista. The City of Victorville General Plan indicates that the San Gabriel Mountains contributes to the unique visual character of the City. The Project site is oriented in an area in which this important visual feature is already compromised by the ongoing mixed development in the area surrounding the project site. These interrupted foreground views indicate that development at this site would not add substantially to interruption of any important public views in any direction once developed. Therefore, the proposed Project would have a less than significant impact on scenic vistas or scenic values at this site.

b. *Less Than Significant Impact* – The project site consists of a highly disturbed native desert habitat with no distinctive features, such as trees or rock outcrops. The site has no distinctive topographic feature that visually distinguish the site. The site is essentially uniformly flat due to its location on the alluvial fan between the San Gabriel Mountains and the Mojave River channel, which is located to the east. The site has been designated for single-family residential use under both the prior General Plan and the current Victorville General Plan. No roadways within the vicinity of the project site are considered eligible for official designation as a County or State Scenic Highway. No other scenic resources are located within the project site, and as such, there are no scenic resources within the site that would be damaged as a result of development of the proposed project. Therefore, there is a less than significant potential to damage a scenic onsite resource.

c. *Less Than Significant Impact* – The TTM 20500, Single-Family Residential site is located within an urbanizing area on the west side of the City of Victorville. The Victorville General Plan has designated the project site for Single-Family Residential Use and the zoning classification is the same. By developing this vacant site in accordance with City General Plan and design guidelines for single-family uses and development plans, the visual character of this site will be converted to a suburban visual setting consistent with nearby single-family residences, but also consistent with the General Plan vision for the City at build-out. With the City's design elements mandated and incorporated in the proposed project, implementation will be consistent with the surrounding urban setting and the potential aesthetic impacts to the site will result in a less than significant impact.

d. *Less Than Significant Impact* – The implementation of the proposed project will create new sources of light during the occupancy phase of the project. Light and glare from interior and exterior building lighting, safety and security slighting, and vehicular traffic accessing the site will generate new light once the site is occupied. The proposed project must be developed in accordance with the City's Development Code, which would ensure that any building or exterior lighting would not significantly impact adjacent uses. Thus, the proposed project will introduce a new source of light into the project area, but standard design requirements can limit the lighting impacts to the project site. Based on this finding, the potential lighting-related impacts of this proposed project ware concluded to be less than significant.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|---|---|---|---|
| **II. AGRICULTURE AND FORESTRY RESOURCES**: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: | | | | |
| a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

SUBSTANTIATION

a-e. *No Impact* – The project site has not historically been used for agriculture or timber management purposes. Accordingly, the City has not designated this site nor zoned this site for agricultural use or timber management, as the General Plan and Zoning Classifications are both Single-Family Residential. This indicates that the City intends for the project site to be developed for a use that would suit this land use designation/zoning classification which it has assigned this project site. Therefore, given that the City does not identify the project site for agricultural use, and that no Prime Farmland, Unique Farmland or Farmland of Statewide Importance has been identified within the project site, implementation of the proposed project and conversion of the project site to the proposed single-family residential uses will not pose any significant adverse impact to agricultural resources or values. No mitigation is required.

Similarly, the project site is not located within forest land, timberland or timberland zoned for Timberland Production. Therefore, the proposed project will not 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 adverse impacts are anticipated and no mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|---|---|---|---|
| **III. AIR QUALITY**: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | ☐ | ☒ | ☐ | ☐ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

SUBSTANTIATION: The background Air Quality data is abstracted from the following report: *"Victorville Residential Air Quality Impact Analysis, City of Victorville"* prepared by Urban Crossroads dated November 16, 2021 provided as Appendix 1 to this document.

Background

The climate of the Victor Valley, technically called an interior valley subclimate of Southern California's Mediterranean-type climate, is characterized by hot summers, mild winters, infrequent rainfall, moderate afternoon breezes, and generally fair weather. The clouds and fog that form along the Southern California coastline rarely extend across the mountains to Victorville and surrounding high desert communities. The most important local weather pattern is associated with the funneling of the daily onshore sea breeze through El Cajon Pass into the upper desert to the northeast of the heavily developed portions of the Los Angeles Basin. This daily airflow brings polluted air into the area late in the afternoon from late spring to early fall. This transport pattern creates both unhealthful air quality as well as destroying the scenic vistas of the mountains surrounding the Victor Valley.

The low annual humidity, moderate temperature swings, very low rainfall and frequent breezy conditions are typical of California's "Upper Desert" subclimate. Most years do not see temperatures drop below about 20°F or above about 105°F. Occasionally, however, there are some very hot temperatures over 105°F with a record high of 113°F in 1995, and some colder temps down to a record low of -1°F in December 1949.

The Victor Valley is in a transition area between the semi-arid conditions of the Los Angeles Basin and the completely arid portions of the Mojave Desert. The Valley's location in the "rainshadow" of the San Gabriel Mountains further enhances its dryness. Rainfall averages around 6 inches per year, with light to moderate rain falling on only 10 days per year. Because of Southern California's location on the edge of the mid-latitude storm track, a shift in the jet stream aloft of a few hundred miles north or south can mean the difference between a year with twice the annual average rainfall and one with drought conditions where less than one-half of the normal rainfall is observed. The project area may occasionally experience a light winter snowfall (1-2 inches per year), but temperatures do not remain cold enough for the snow to stay on the ground for very long.

Winds blow primarily from south to north and from west to east in response to the regional pattern of airflow from the cool ocean to the heated interior. A large portion of the airflow across the proposed project area

therefore has its origin in more developed areas of the Los Angeles Basin. Over 50 percent of all airflow derives from a narrow sector from south through west. These winds are moderately strong, averaging from 8-12 mph, but become light and variable at night with about 10 percent of all hours almost complete calm. Afternoon winds may, at times, exceed 20 mph and begin to pick up fine dust and other loose material.

The wind distribution is an important atmospheric parameter because it controls both the initial rate of pollutant dispersal near the source as well as the ultimate regional trajectory of air pollution. These prevailing winds provide a vehicle for visible smog to be transported from the South Coast Air Basin through the mountain passes to the Mojave Desert Air Basin (MDAB). The rapid daytime heating of the lower air leads to convective activity. This exchange of upper air tends to accelerate surface winds during the warm part of the day when convection is at a maximum. During the winter, the rapid cooling of the surface layers at night retards this exchange of momentum which often results in calm winds.

In addition to winds which govern the horizontal dispersion of locally generated emissions, vertical temperature structure controls the depth through which pollutants can be mixed. The strong surface heating by day in the Mojave Desert usually creates a vertical temperature distribution that decreases rapidly with height (unstable). At night, especially in winter, cool air settles in low-lying areas and forms shallow radiation-induced temperature inversions (stable) that may temporarily restrict the dispersion of low-level pollutant emissions. Such inversions "burn off" rapidly after sunrise. The elevated subsidence/marine inversions that create major air quality problems in coastal environments are rarely observed in the desert. When they do form, their bases are from 6 - 8,000 feet mean sea level and thus do not impede vertical dispersion. The low-level radiation inversions, however, play an important role in limiting the dispersive capacity of the local airshed from late evening to the next morning. Because they burn off rapidly in the morning, their importance to the dispersion of air contaminants is limited to localized effects.

*Ambient Air Quality Setting*

In order to gauge the significance of the air quality impacts of the proposed project, those impacts, together with existing background air quality levels, must be compared to the applicable ambient air quality standards. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise, called "sensitive receptors." Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed. Recent research has shown, however, that chronic exposure to ozone (the primary ingredient in photochemical smog) may lead to adverse respiratory health even at concentrations close to the ambient standard.

National AAQS were established in 1971 for six pollution species with states retaining the option to add other pollutants, require more stringent compliance, or to include different exposure periods. The initial attainment deadline of 1977 was extended several times in air quality problem areas like Southern California. In 2003, the Environmental Protection Agency (EPA) adopted a rule, which extended and established a new attainment deadline for ozone for the year 2021. Because the State of California had established AAQS several years before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those standards currently in effect in California are shown in Table III-1. Sources and health effects of various pollutants are shown in Table III-2.

The Federal Clean Air Act Amendments (CAAA) of 1990 required that the U.S. Environmental Protection Agency (EPA) review all national AAQS in light of currently known health effects. EPA was charged with modifying existing standards or promulgating new ones where appropriate. EPA subsequently developed standards for chronic ozone exposure (8+ hours per day) and for very small diameter particulate matter (called "PM-2.5"). New national AAQS were adopted in 1997 for these pollutants.

Planning and enforcement of the federal standards for PM-2.5 and for ozone (8-hour) were challenged by trucking and manufacturing organizations. In a unanimous decision, the U.S. Supreme Court ruled that

EPA did not require specific congressional authorization to adopt national clean air standards. The Court also ruled that health-based standards did not require preparation of a cost-benefit analysis. The Court did find, however, that there was some inconsistency between existing and "new" standards in their required attainment schedules. Such attainment-planning schedule inconsistencies centered mainly on the 8-hour ozone standard. EPA subsequently agreed to downgrade the attainment designation for a large number of communities to “non-attainment” for the 8-hour ozone standard.

Evaluation of the most current data on the health effects of inhalation of fine particulate matter prompted the California Air Resources Board (ARB) to recommend adoption of the statewide PM-2.5 standard that is more stringent than the federal standard. This standard was adopted in 2002. The State PM-2.5 standard is more of a goal in that it does not have specific attainment planning requirements like a federal clean air standard, but only requires continued progress towards attainment.

Similarly, the ARB extensively evaluated health effects of ozone exposure. A new state standard for an 8-hour ozone exposure was adopted in 2005, which aligned with the exposure period for the federal 8-hour standard. The California 8-hour ozone standard of 0.07 ppm is more stringent than the federal 8-hour standard of 0.075 ppm. The state standard, however, does not have a specific attainment deadline. California air quality jurisdictions are required to make steady progress towards attaining state standards, but there are no hard deadlines or any consequences of non-attainment. During the same re-evaluation process, the ARB adopted an annual state standard for nitrogen dioxide ($NO_{2)}$ that is more stringent than the corresponding federal standard, and strengthened the state one-hour $NO_2$ standard.

As part of EPA’s 2002 consent decree on clean air standards, a further review of airborne particulate matter (PM) and human health was initiated. A substantial modification of federal clean air standards for PM was promulgated in 2006. Standards for PM-2.5 were strengthened, a new class of PM in the 2.5- to 10-micron size was created, some PM-10 standards were revoked, and a distinction between rural and urban air quality was adopted. In December, 2012, the federal annual standard for PM-2.5 was reduced from 15 $\mu g/m^3$ to 12 $\mu g/m^3$ which matches the California AAQS. The severity of the basin’s non-attainment status for PM-2.5 may be increased by this action and thus require accelerated planning for future PM-2.5 attainment.

In response to continuing evidence that ozone exposure at levels just meeting federal clean air standards is demonstrably unhealthful, EPA had proposed a further strengthening of the 8-hour standard. A new 8-hour ozone standard was adopted in 2015 after extensive analysis and public input. The adopted national 8-hour ozone standard is 0.07 ppm which matches the current California standard. It will require three years of ambient data collection, then 2 years of non-attainment findings and planning protocol adoption, then several years of plan development and approval. Final air quality plans for the new standard are likely to be adopted around 2022. Ultimate attainment of the new standard in ozone problem areas such as Southern California might be after 2025.

Of the standards shown in Table III-1, those for ozone ($O_3$), and particulate matter (PM-10) are exceeded at times in the MDAB. They are called “non-attainment pollutants.” Because of the variations in both the regional meteorology and in area-wide differences in levels of air pollution emissions, patterns of non-attainment have strong spatial and temporal differences.

**Table III-1**

## Ambient Air Quality Standards

| Pollutant | Averaging Time | California Standards [1] | | National Standards [2] | | |
|---|---|---|---|---|---|---|
| | | Concentration [3] | Method [4] | Primary [3,5] | Secondary [3,6] | Method [7] |
| Ozone ($O_3$)[8] | 1 Hour | 0.09 ppm (180 µg/m$^3$) | Ultraviolet Photometry | — | Same as Primary Standard | Ultraviolet Photometry |
| | 8 Hour | 0.070 ppm (137 µg/m$^3$) | | 0.070 ppm (137 µg/m$^3$) | | |
| Respirable Particulate Matter (PM10)[9] | 24 Hour | 50 µg/m$^3$ | Gravimetric or Beta Attenuation | 150 µg/m$^3$ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 20 µg/m$^3$ | | — | | |
| Fine Particulate Matter (PM2.5)[9] | 24 Hour | — | — | 35 µg/m$^3$ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 12 µg/m$^3$ | Gravimetric or Beta Attenuation | 12.0 µg/m$^3$ | 15 µg/m$^3$ | |
| Carbon Monoxide (CO) | 1 Hour | 20 ppm (23 mg/m$^3$) | Non-Dispersive Infrared Photometry (NDIR) | 35 ppm (40 mg/m$^3$) | — | Non-Dispersive Infrared Photometry (NDIR) |
| | 8 Hour | 9.0 ppm (10 mg/m$^3$) | | 9 ppm (10 mg/m$^3$) | — | |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m$^3$) | | — | — | |
| Nitrogen Dioxide ($NO_2$)[10] | 1 Hour | 0.18 ppm (339 µg/m$^3$) | Gas Phase Chemiluminescence | 100 ppb (188 µg/m$^3$) | — | Gas Phase Chemiluminescence |
| | Annual Arithmetic Mean | 0.030 ppm (57 µg/m$^3$) | | 0.053 ppm (100 µg/m$^3$) | Same as Primary Standard | |
| Sulfur Dioxide ($SO_2$)[11] | 1 Hour | 0.25 ppm (655 µg/m$^3$) | Ultraviolet Fluorescence | 75 ppb (196 µg/m$^3$) | — | Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method) |
| | 3 Hour | — | | — | 0.5 ppm (1300 µg/m$^3$) | |
| | 24 Hour | 0.04 ppm (105 µg/m$^3$) | | 0.14 ppm (for certain areas)[11] | — | |
| | Annual Arithmetic Mean | — | | 0.030 ppm (for certain areas)[11] | — | |
| Lead[12,13] | 30 Day Average | 1.5 µg/m$^3$ | Atomic Absorption | — | — | High Volume Sampler and Atomic Absorption |
| | Calendar Quarter | — | | 1.5 µg/m$^3$ (for certain areas)[12] | Same as Primary Standard | |
| | Rolling 3-Month Average | — | | 0.15 µg/m$^3$ | | |
| Visibility Reducing Particles[14] | 8 Hour | See footnote 14 | Beta Attenuation and Transmittance through Filter Tape | **No National Standards** | | |
| Sulfates | 24 Hour | 25 µg/m$^3$ | Ion Chromatography | | | |
| Hydrogen Sulfide | 1 Hour | 0.03 ppm (42 µg/m$^3$) | Ultraviolet Fluorescence | | | |
| Vinyl Chloride[12] | 24 Hour | 0.01 ppm (26 µg/m$^3$) | Gas Chromatography | | | |

**See footnotes on next page …**

For more information please call ARB-PIO at (916) 322-2990 California Air Resources Board (5/4/16)

Table III-1 (continued)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

11. On June 2, 2010, a new 1-hour $SO_2$ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 $SO_2$ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

**For more information please call ARB-PIO at (916) 322-2990** **California Air Resources Board (5/4/16)**

**Table III-2**
**HEALTH EFFECTS OF MAJOR CRITERIA POLLUTANTS**

| Pollutants | Sources | Primary Effects |
|---|---|---|
| Carbon Monoxide (CO) | • Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust.<br>• Natural events, such as decomposition of organic matter. | • Reduced tolerance for exercise.<br>• Impairment of mental function.<br>• Impairment of fetal development.<br>• Death at high levels of exposure.<br>• Aggravation of some heart diseases (angina). |
| Nitrogen Dioxide ($NO_2$) | • Motor vehicle exhaust.<br>• High temperature stationary combustion.<br>• Atmospheric reactions. | • Aggravation of respiratory illness.<br>• Reduced visibility.<br>• Reduced plant growth.<br>• Formation of acid rain. |
| Ozone ($O_3$) | • Atmospheric reaction of organic gases with nitrogen oxides in sunlight. | • Aggravation of respiratory and cardiovascular diseases.<br>• Irritation of eyes.<br>• Impairment of cardiopulmonary function.<br>• Plant leaf injury. |
| Lead (Pb) | • Contaminated soil. | • Impairment of blood function and nerve construction.<br>• Behavioral and hearing problems in children. |
| Respirable Particulate Matter (PM-10) | • Stationary combustion of solid fuels.<br>• Construction activities.<br>• Industrial processes.<br>• Atmospheric chemical reactions. | • Reduced lung function.<br>• Aggravation of the effects of gaseous pollutants.<br>• Aggravation of respiratory and cardio respiratory diseases.<br>• Increased cough and chest discomfort.<br>• Soiling.<br>• Reduced visibility. |
| Fine Particulate Matter (PM-2.5) | • Fuel combustion in motor vehicles, equipment, and industrial sources.<br>• Residential and agricultural burning.<br>• Industrial processes.<br>• Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics. | • Increases respiratory disease.<br>• Lung damage.<br>• Cancer and premature death.<br>• Reduces visibility and results in surface soiling. |
| Sulfur Dioxide ($SO_2$) | • Combustion of sulfur-containing fossil fuels.<br>• Smelting of sulfur-bearing metal ores.<br>• Industrial processes. | • Aggravation of respiratory diseases (asthma, emphysema).<br>• Reduced lung function.<br>• Irritation of eyes.<br>• Reduced visibility.<br>• Plant injury.<br>• Deterioration of metals, textiles, leather, finishes, coatings, etc. |

Source: California Air Resources Board, 2002.

*Baseline Air Quality*

Monitoring of air quality in the MDAB is the responsibility of the Mojave Desert Air Quality Management District (MDAQMD) headquartered in Victorville, California. Existing levels of criteria air pollutants in the project area can generally be inferred from measurements conducted at the Victorville Station at 14306 Park Avenue. Although the Victorville Station monitors most of the spectrum of pollutants, data for CO is no longer monitored in the Mojave Desert. Table III-3 summarizes the last three years of monitoring data from the available data for this Victorville monitoring station. From these data one can infer that baseline air quality levels near the project site are occasionally unhealthful, but that such violations of clean air standards usually affect only those people most sensitive to air pollution exposure.

a. Photochemical smog (ozone) levels occasionally exceed standards. The 8-hour state ozone standard has been exceeded approximately 7 percent of all days in the last three years while the 1-hour state standard has been exceeded less than one percent of all days. The 8-hour federal standard has been exceeded approximately 5 percent of all days in the past three years. Attainment of all clean air standards in the project vicinity is not likely to occur soon, but the severity and frequency of violations is expected to continue to slowly decline during the current decade

b. Respirable dust (PM-10) levels often exceed the state standard of 50 $\mu g/m^3$ but the less stringent federal PM-10 standard of 150 $\mu g/m^3$ is violated with much less frequency. However, given the high Max. 24-Hour concentrations it is clear that PM-10 is still of concern.

c. A substantial fraction of PM-10 is comprised of ultra-small diameter particulates capable of being inhaled into deep lung tissue (PM-2.5). There has only been one measured violation in the last three years.

Although complete attainment of every clean air standard is not yet imminent, extrapolation of the steady improvement trend suggests that such attainment could occur within the reasonably near future.

*Standards of Significance*

The Mojave Desert AQMD has adopted numerical emissions thresholds as indicators of potential impact even if the actual air quality increment cannot be directly quantified. The MDAQMD thresholds are as follows:

| | | |
|---|---|---|
| Carbon Monoxide (CO) | 548 pounds/day | 100 tons/year |
| Nitrogen Oxides (NOx) | 137 pounds/day | 25 tons/year |
| Sulfur Oxides (SOx) | 137 pounds/day | 25 tons/year |
| Reactive Organic Gases (ROG) | 137 pounds/day | 25 tons/year |
| Particulate Matter (PM-10) | 82 pounds/day | 15 tons/year |
| Particulate Matter (PM-2.5) | 65 pounds/day | 12 tons/year |
| GHG | 548,000 pounds/day | 100,000 tons/year |

**Table III-3**
**AIR QUALITY MONITORING SUMMARY (2016-2018)**
**(Number of Days Standards Were Exceeded and Maximum Levels During Such Violations)**
**(Entries shown as estimated days exceeding standard)**

| Pollutant/Standard | 2016 | 2017 | 2018 |
|---|---|---|---|
| **Ozone** | | | |
| 1-Hour > 0.09 ppm (S) | 4 | 0 | 5 |
| 8-Hour > 0.07 ppm (S) | 33 | 17 | 55 |
| 8- Hour > 0.075 ppm (F) | 18 | 7 | 27 |
| Max. 1-Hour Conc. (ppm) | 0.100 | 0.088 | 0.107 |
| Max. 8-Hour Conc. (ppm) | 0.086 | 0.082 | 0.097 |
| **Nitrogen Dioxide** | | | |
| 1-Hour > 0.18 ppm (S) | 0 | 0 | 0 |
| Max. 1-Hour Conc. (ppm) | 0.097 | 0.057 | 0.057 |
| **Inhalable Particulates (PM-10)** | | | |
| 24-Hour > 50 $\mu g/m^3$ (S) | na | na | Na |
| 24-Hour > 150 $\mu g/m^3$ (F) | 1.9 | 1.0 | 1.0 |
| Max. 24-Hr. Conc. ($\mu g/m^3$) | 226.5 | 182.5 | 165.2 |
| **Ultra-Fine Particulates (PM-2.5)** | | | |
| 24-Hour > 35 $\mu g/m^3$ (F) | 1 | 0 | 0 |
| Max. 24-Hr. Conc. ($\mu g/m^3$) | 41.5 | 27.2 | 32.7 |

na = not available
S=State Standard
F=Federal Standard

Source:Victorville Station: Ozone, CO, $NO_2$, PM-10, PM-2.5
data: www.arb.ca.gov/adam/

a. *Less Than Significant Impact* – Projects such as the proposed TTM 20500, Single-Family Residential Project do not directly relate to the AQMP in that there are no specific air quality programs or regulations governing general development. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The single-family residential development proposed is consistent with the City's General Plan, and based on the emission forecast below, the proposed project will not exceed the MDAQMD thresholds of significance. Therefore, the proposed project can be considered consistent with the AQMP and it will not conflict with or obstruct implementation of the applicable AQMP.

b. *Less Than Significant With Mitigation Incorporated* – Air pollution emissions associated with the proposed Project would occur over both a short and long-term time periods. Short-term emissions include fugitive dust from construction activities (i.e., site prep, demolition, grading, and exhaust emission) at the proposed Project site. Long-term emissions generated by future operation of the proposed Project primarily include energy consumption and trips generated by the future development.

Table III-4 and Table III-5 compare the estimated annual and daily emissions summaries from the construction and operation of the proposed housing development to the significant emission

thresholds described in the Mojave Desert Air Quality Management District CEQA and Federal Conformity Guidelines, dated February 2020, summarized above. The estimated emissions of criteria pollutants are provided for each year of construction and the total operational emissions are well below the applicable thresholds. Based on these findings, the proposed project could be developed without any mitigation. However, since the Mojave Desert Air Basin is not in attainment for PM-10 and Ozone, the following mitigation measures will be implemented during construction to minimize these emissions.

**Table III-4**
**ANNUAL EMISSIONS SUMMARY AND SIGNIFICANCE THRESHOLDS**

| Emissions Source | Total Emissions (tons per year) | | | | | | |
|---|---|---|---|---|---|---|---|
| | ROG | NOx | CO | SOx | $PM_{10}$ | $PM_{2.5}$ | $CO_2e$ |
| Year 1 Construction Emissions (2023) | 0.34 | 2.83 | 3.16 | 0.01 | 0.54 | 0.25 | 719 |
| Year 2 Construction Emissions (2024) | 0.30 | 2.26 | 3.06 | 0.01 | 0.43 | 0.17 | 737 |
| Year 3 Construction Emissions (2025) | 1.06 | 0.52 | 0.80 | <0.01 | 0.09 | 0.04 | 165 |
| Total Operational Emissions | 1.72 | 0.96 | 5.47 | 0.01 | 1.13 | 0.32 | 1,454 |
| **Significant Emissions Threshold** | **25** | **25** | **100** | **25** | **15** | **12** | **100,000** |

**Table III-5**
**DAILY EMISSIONS SUMMARY AND SIGNIFICANCE THRESHOLDS**

| Emissions Source | Total Emissions (tons per year) | | | | | | |
|---|---|---|---|---|---|---|---|
| | ROG | NOx | CO | SOx | $PM_{10}$ | $PM_{2.5}$ | $CO_2e$ |
| Year 1 Construction Emissions (2023) | 3.39 | 34.55 | 28.62 | 0.06 | 9.08 | 5.14 | 6,459 |
| Year 2 Construction Emissions (2024) | 2.45 | 17.00 | 24.25 | 0.06 | 3.33 | 1.34 | 6,352 |
| Year 3 Construction Emissions (2025) | 56.78 | 15.95 | 23.64 | 0.06 | 3.24 | 1.26 | 6,249 |
| Total Operational Emissions | 10.42 | 6.53 | 37.65 | 0.08 | 6.60 | 1.98 | 9,533 |
| **Significant Emissions Threshold** | **137** | **137** | **548** | **137** | **82** | **65** | **548,000** |

ROG: Reactive Organic Compounds, used interchangeably with Volatile Organic Compounds (VOC); NOx: oxides of nitrogen; CO: Carbon monoxide; SOx: oxides of sulfur; $PM_{10}$: particulate matter less than 10 micrometers in diameter; $PM_{2.5}$: particulate matter less than 2.5 micrometers in diameter; and $CO_2e$: Carbon dioxide equivalent

***AQ-1*** ***Fugitive Dust Control. The following measures shall be incorporated into Project plans and specifications for implementation:***

- ***Apply soil stabilizers or moisten inactive areas.***
- ***Water exposed surfaces to avoid visible dust leaving the construction site (at least 2-3 times/day).***
- ***Cover all stock piles with tarps at the end of each day and as needed during the construction day.***
- ***Provide water spray during loading and unloading of earthen materials.***
- ***Require the contractor to minimize in-out traffic from construction zone to the extent feasible, and enforce a speed limit of 15 MPH on site to avoid dust migration from the site.***
- ***Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard.***
- ***Sweep streets daily if visible soil material is carried out from the construction site.***

Similarly, ozone precursor emissions (ROG and NOx) are calculated to be below SCAQMD CEQA thresholds. However, because of the regional non-attainment for photochemical smog, the use of reasonably available control measures for diesel exhaust is recommended. Combustion emissions control options include:

***AQ-2*** ***<u>Exhaust Emissions Control</u>. The following measures shall be incorporated into Project plans and specifications for implementation:***

- ***Utilize off-road construction equipment that has met or exceeded the maker's recommendations for vehicle/equipment maintenance schedule.***
- ***Contactors shall utilize Tier 4 or better heavy equipment.***
- ***Enforce 5-minute idling limits for both on-road trucks and off-road equipment.***

c. *Less Than Significant Impact* – The development of the proposed project is located on an approximate 60-acre site. As previously stated, the total development is proposed to consist of 210 single-family residences. According to the Urban Crossroads report (Appendix 1), the proposed project is not considered one of the project types that MDAQMD CEQA Guidelines require to be evaluated for potentially exposing sensitive receptors to substantial pollutant concentrations. As such the project was not evaluated for Local Significance Thresholds, hazardous pollutant concentrations, or potential health risks to sensitive receptors. The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed.

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

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

SUBSTANTIATION: The following information is provided based on a study titled *"Biological Resources Assessment and Focused Desert Tortoise Survey for TTM 20500 on APN #3103-551-05"* (BRA) prepared by Jacobs dated September 2022 and provided as Appendix 2.

General Site Conditions

The project area is in the western portion of the Mojave Desert, on the west side of the Mojave River. The topography of the project area is relatively flat with a slight slope to the northeast. Elevation within the proposed project area is approximately 3,000 feet above mean sea level (amsl). The project site occurs in an area with a mix or residential and commercial uses. Habitat types within the project area include *Larrea tridentata* Shrubland Alliance (creosote bush scrub).

The project survey site is vacant land situated between commercial uses to the south and residential uses to the east, north and south. A school and solar uses occur to the southeast. Immediately adjacent lands are located to adjacent to the project site. The site and general area support a mixed shrub community typical of the area and generally characterized by native shrub vegetation with extensive disturbance from off-highway vehicles and the dumping of trash, and transient encampments. Dominant species are creosote bush (*Larrea tridentata*), burrobush (*Franseria dumosa*), rabbit brush (*Chrysothamnus depressus*), indian rice grass (*Oryzopsis hymenoides*) and Russian thistle (*Salsola sp.).* Annuals observed during the survey included fiddleneck (*Amsinckia sp.),* brome (*Bromus sp.),* filaree Storksbill (*Erodium sp.),* and schismus (*Schismus barbatus*). Human disturbances associated with the surrounding developments.

The predominant wildlife species observed or otherwise detected during the reconnaissance-level survey were birds, including house sparrow (*Passer domesticus*), Pigeon (*Columba livia*), •common raven (Corvus corax), house finch (Haemorhous mexicanus), Say's phoebe (Sayornis saya), white-crowned sparrow (Zonotrichia leucophrys), and mourning dove (Zenaida macroura). Mammal species observed or otherwise detected during the reconnaissance-level survey included white-tailed antelope squirrel (Ammospermophilus leucurus), black-tailed jackrabbit (Lepus californicus) and desert cottontail (Sylvilagus audubonii). Other common species expected to occur within the Project Area include California ground squirrel (Otospermophilus beecheyi) and domestic dog (Canis lupis familiaris).

Conclusion

The BRA survey was conducted by Jacobs in 2022 to identify potential habitat for special status plants and wildlife within the project area. The western Joshua Tree, a State candidate for listing as threatened or endangered, was observed within the project area during survey. The proposed project is within an already disturbed environment surrounded by existing residential and commercial development. Some of the desert scrub habitat within the project site is marginally suitable for several special status species, and their historic occurrences of this species on the project site.

*Western Joshua Tree*
Joshua Tree was identified on the site during the general biological survey. Joshuas are fully protected in the State of California at this time, and may not be trimmed, moved, or removed regardless of condition unless permitted to do so by the California Department of Fish and Wildlife (CDFW).

*Desert Tortoise*
Based on the habitat conditions and existing disturbances within the project site and surrounding area, as well as the proximity of the project area relative to the current known population distributions of desert tortoise, this species is not likely to occur within the project area and the project is not likely to adversely affect this species. In order to ensure avoidance, the mitigation measures are recommended for Mojave Desert tortoise.

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

*Burrowing Owl*
A burrowing owl (BUOW) habitat suitability assessment was conducted by Jacobs' biologists at the project site, wherever potentially suitable BUOW habitat was present. Although no BUOW individuals or sign including castings, feathers or whitewash were observed and BUOW are considered absent from the project area at the time of survey; a focused protocol survey should be conducted prior to initiating construction. Because the project is not likely to adversely affect this species, there is still a low potential for this species to occur in the project area and precautionary avoidance measures are recommended to ensure the project does not result in any impacts to BUOW.

*Nesting Birds*
There is habitat within the project area that is suitable to support nesting birds. Most native bird species are protected from unlawful take by the Migratory Bird Treaty Act (MBTA) (Appendix A). In December 2017, the Department of the Interior (DOI) issued a memorandum concluding that the MBTA's prohibitions on take apply "[...] only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs". Then in April 2018, the United States Fish and Wildlife Service (USFWS) issued a guidance memorandum that further clarified that the take of migratory birds or their active nests (i.e., with eggs or young) that is incidental to, and not the purpose of, an otherwise lawful activity does not constitute a violation of the MBTA.

However, the State of California provides additional protection for native bird species and their nests in the California Fish and Game Code (FGC) (Appendix A). Bird nesting protections in the FGC include the following (Sections 3503, 3503.5, 3511, 3513 and 3800):

- Section 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird.
- Section 3503.5 prohibits the take, possession, or needless destruction of any nests, eggs, or birds in the orders Falconiformes (new world vultures, hawks, eagles, ospreys, and falcons, among others), and Strigiformes (owls).
- Section 3511 prohibits the take or possession of Fully Protected birds.
- Section 3513 prohibits the take or possession of any migratory nongame bird or part thereof, as designated in the MBTA. To avoid violation of the take provisions, it is generally required that project-related disturbance at active nesting territories be reduced or eliminated during the nesting cycle.
- Section 3800 prohibits the take of any non-game bird (i.e., bird that is naturally occurring in California that is not a gamebird, migratory game bird, or fully protected bird).

The project could result in direct impacts to nesting birds potentially occurring within the project site. In general, impacts to all bird species (common and special status) can be avoided by conducting work outside of the nesting season, which is generally February 15th through August 31st. However, if all work cannot be conducted outside of nesting season, mitigation is required to minimize impacts.

*Jurisdictional Waters*
In addition to the BRA and focused botanical field survey, Jacobs also assessed the project area of potential effect (APE) for the presence of any state and/or federal jurisdictional waters. The result of the jurisdictional waters assessment is that there are no wetland or non-wetland waters of the United States (WOTUS) or waters of the State potentially subject to regulation by the United States Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA), the RWQCB under Section 401 of the CWA and/or Porter Cologne Water Quality Control Act, or the CDFW under Section 1602 of the FGC, respectively. Therefore, the project will not impact any jurisdictional waters and no state or federal jurisdictional waters permitting will be required.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – Implementation of the project has a potential for a significant adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The project site is vacant containing various types of native and non-native vegetation. The Biological Resources Assessment (BRA) provided as Appendix 2 to this Initial Study determined that the project site contains suitable habitat for burrowing owl and desert tortoise, and the site was determined to be unlikely to support Mojave ground squirrel; however, no State- and/or federally listed threatened or endangered species, or other sensitive species were observed on site during the field survey. Thus, for purposes of this analysis, it is assumed that temporary ground disturbance within the project site may have a potential to adversely impact (a State and federally-listed of special concern [SSC]), and desert tortoises (a State and federally-listed threatened species). As such, the following mitigation measures shall be implemented to prevent any impacts to burrowing owl, desert tortoise, and Mohave ground squirrel:

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

***BIO-2*** ***BUOW would be included as one of the species covered in the WEAP that all construction crews, foremen, and other project personnel potentially working on site should attend prior to the first day of work.***

***Preconstruction presence/absence surveys for burrowing owl shall be conducted no less than 3 days prior to any onsite ground disturbing activity by a qualified biologist, including prior to each phase of new ground disturbance. The burrowing owl surveys shall be conducted pursuant to the recommendations and guidelines established by the California Department of Fish and Wildlife in the "California Department of Fish and Wildlife 2012 Staff Report on Burrowing Owl Mitigation." In the event this species is not identified within the project limits, no further mitigation is required, and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to commencement of project activities. If during the preconstruction survey, the burrowing owl is found to occupy the site, Mitigation Measure BIO-3 shall be required.***

***BIO-3*** ***If burrowing owls are identified during the survey period, the Developer, in conjunction with the City, shall take the following actions to offset impacts prior to ground disturbance:***

***The Developer, in conjunction with the City shall notify CDFW within three business days of determining that a burrowing owl is occupying the site to discuss the observed location, activities and behavior of the burrowing owl(s) and appropriate avoidance and minimization measures.***

***Active nests within the areas scheduled for disturbance or degradation shall be avoided until fledging has occurred, as confirmed by a qualified biologist. Following fledging, owls may be passively relocated by a qualified biologist, as described below.***

***If impacts on occupied burrows are unavoidable, onsite passive relocation techniques may be used if approved by the CDFW to encourage owls to move to alternative burrows provided by the Developer outside of the impact area.***

***If relocation of the owls is approved for the site by CDFW, CDFW shall require the Developer to hire a qualified biologist to prepare a plan for relocating the owls to a suitable site and conduct an impact assessment. A qualified biologist shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) to the CDFW for review/approval prior to the commencement of disturbance activities onsite.***

***The relocation plan must include all of the following and as indicated in Appendix E:***

- ***The location of the nest and owls proposed for relocation.***
- ***The location of the proposed relocation site.***
- ***The number of owls involved and the time of year when the relocation is proposed to take place.***
- ***The name and credentials of the biologist who will be retained to supervise the relocation.***
- ***The proposed method of capture and transport for the owls to the new site.***

- ***A description of site preparation at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one-time or long-term vegetation control).***

***The Developer shall conduct an impact assessment, in accordance with the Staff Report on Burrowing Owl Mitigation prior to commencing project activities to determine appropriate mitigation, including the acquisition and conservation of occupied replacement habitat at no less than a 2:1 ratio.***

***Prior to passive relocation, suitable replacement burrows site(s) shall be provided at a ratio of 2:1 and permanent conservation and management of burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owl impacts are replaced consistent with the Staff Report on Burrowing Owl Mitigation including its Appendix A within designated adjacent conserved lands identified through coordination with CDFW and the City. A qualified biologist shall confirm the natural or artificial burrows on the conservation lands are suitable for use by the owls. Monitoring and management of the replacement burrow site(s) shall be conducted and a reporting plan shall be prepared. The objective shall be to manage the replacement burrow sites for the benefit of burrowing owls (e.g., minimizing weed cover), with the specific goal of maintaining the functionality of the burrows for a minimum of 2 years.***

***A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.***

***BIO-4*** ***Although no desert tortoises were detected during the site surveys, habitat within the project footprint is considered marginally suitable for this species. Therefore, a qualified biologist shall conduct a pre-construction clearance survey no more than 14 days prior to initiating construction in accordance with U.S. Fish and Wildlife Service's (2019) survey protocol; if the biologist detects a desert tortoise, the biologist or applicant will contact the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife immediately.***

The Joshua tree is a California State Candidate for listing as threatened or endangered. As a candidate species, the Joshua Tree is fully protected and cannot be trimmed, removed if fallen, removed, or relocated without a permit from the California Department of Fish and Wildlife. After a two year period as a candidate species, the State proceeded to adopt the Western Joshua Tree Conservation Act (WJTCA) in July 2023 to create a streamlined permitting framework for certain development activities. It also collects mitigation fees for the acquisition and conservation of western Joshua tree habitat and other actions to conserve western Joshua Tree. The new law is designed to offset the imp ats of permitted projects that negatively impact western Joshua trees and help conserve the species on a landscape scale.

Three western Joshua Trees exist within and adjacent to the project site. A Map indicating the locations of the three trees is provided as Figure IV-1, and photos of the trees are shown on Figures IV-2 and IV-3. These trees and any undiscovered trees on site will need to be managed in accordance with the WJTCA. As such, the following mitigation measure shall be implemented to avoid potential impacts to Joshua Tree.

***BIO-5*** ***Prior to construction, a preconstruction survey shall be conducted by a qualified biologist to verify the location or locations of Joshua Trees on site. The qualified biologist, preferrably a Desert Native Plant Specialist, shall prepare a report that shall be submitted to the City that shall identify and provide: a) the GPS coordinates and accompanying map of each WJT within***

***the project area; b) the age class of each WJT; c) the number of clonal WJT associated with each parent plant and the methodology used to make this determination; d) a unique numbering system for each WJT, and e) geo-referenced, representative photos of parent trees, clones, and general distribution of WJT across the project site. The report shall show the location of the proposed grading/construction and all existing western Joshua trees with photos showing all western Joshua trees in relation to the proposed grading/construction. The report shall include findings and avoidance or mitigation recommendations in conformance with the WJTCA after consultation with the California Department of Fish and Game.***

***A biological monitor shall be present for all construction-related activities and shall ensure that any required buffers are maintained for the duration of construction, such that any direct or indirect impacts to any western Joshua trees are consisent with the agreement negotiated under the WJTCA.***

Therefore, with implementation of the above mitigation, there is a less than significant potential for implementation of this project to have a significant adverse effect, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

b. *Less Than Significant Impact* – Implementation of the proposed project has a potential to have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. Though the project footprint contains suitable habitat for several sensitive species, it does not contain any known riparian habitat or any other sensitive natural community identified by any agency. The project site itself consists of creosote bush (*Larrea tridentata*), burrobush (*Franseria dumosa*), rabbit brush (*Chrysothamnus depressus*), indian rice grass (*Oryzopsis hymenoides*) and Russian thistle (*Salsola sp*.). Annuals observed during the survey included fiddleneck (*Amsinckia sp.),* brome (*Bromus sp.),* filaree Storksbill (*Erodium sp*.), and schismus (*Schismus barbatus*). None of the above are considered to be sensitive natural communities and none have been identified as part of the BRA. Therefore, there is a less than significant potential for implementation of this project to have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

c. *No Impact* – According to the data gathered by Jacobs in the BRA, no federally protected wetlands occur within the project footprint. Jacobs assessed the project APE for the presence of any state and/or federal jurisdictional waters. The result of the jurisdictional waters assessment is that there are no wetland or non-wetland WOTUS or waters of the State potentially subject to regulation by the USACE under Section 404 of the CWA, the RWQCB under Section 401 of the CWA and/or Porter Cologne Water Quality Control Act, or the CDFW under Section 1602 of the FGC, respectively. Therefore, the project will not impact and jurisdictional waters and no state or federal jurisdictional waters permitting will be required. Therefore, implementation of the proposed project will have no potential to impact any federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – Based on the field survey of the project site, the project will not substantially interfere with the movement of any native resident or migratory species or with established native or migratory wildlife corridors, or impede the use of native nursery sites. However, the State does protect all migratory and nesting native birds. No impacts to nesting or migratory birds have been identified in Appendix 2, with the exception evidence of suitable BUOW habitat for which MMs **BIO-2** and **BIO-3** have been identified to reduce impacts to a level of less than significant. Thus, the project area may include locations that function as nesting locations for native birds. To prevent interfering with native bird nesting, the following mitigation measure shall be implemented.

***BIO-6*** ***If the bird nesting season cannot be avoided, nesting bird surveys shall be conducted by a qualified avian biologist no more than three (3) days prior to vegetation clearing or ground disturbance activities. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the preconstruction nesting bird surveys, a Nesting Bird Plan (NBP) shall be prepared and implemented by the qualified avian biologist. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, ongoing monitoring, establishment of avoidance and minimization measures, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, individual/pair's behavior, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. To avoid impacts to nesting birds, any grubbing or vegetation removal should occur outside peak breeding season (typically February 1 through September 1).***

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

e. *Less Than Significant With Mitigation Measure* – Please refer to the discussion under issue IV(a) above. Based on the field survey, the project footprint contains one identified resource—Joshua trees—that are protected by local policies or ordinances. Thus, there is a potential for significant adverse impacts to Joshua trees and its habitat, but the proposed project must adhere to MM **BIO-5**, provided above, which will ensure that the proposed development would be carried out without any adverse impacts to this species, and that all State regulations are complied with where avoidance of the western Joshua trees within the project site is not feasible. As such, mitigation measure **BIO-5** will ensure that the project complies with the State regulations, in addition to City codes. No other biological resources located within the project footprint are protected under local policies or ordinances. Thus, with the implementation of mitigation measure **BIO-5**, impacts under this issue are considered less than significant.

f. *No Impact* – Please refer to the discussion under response IV(a) above. The Biological Resources Assessment provided as Appendix 2 concluded that the project, is not located in an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the project will therefore not result in a significant impact to any such plans. No further mitigation is necessary.

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

SUBSTANTIATION: The information provided in this section of the Initial Study is abstracted from the following report: *"Historical/Archaeological Resources Survey Report, Tentative Tract Map Number 20500, City of Victorville, San Bernardino County, California"* prepared by CRM TECH dated October 4, 2022. This Report is provided as Appendix 3 of this Initial Study.

Background

Between August 2021and October 2022, at the request of Tom Dodson & Associates, CRM TECH performed a cultural resources study on Tentative Tract Map Number 20500 in the western portion of the City of Victorville, San Bernardino County, California. The subject property of the study consists of approximately 60.6 acres of undeveloped land on the south side of Seneca Road and to the east of U.S. Highway 395, in the northwest quarter of Section 22, T5N R5W, San Bernardino Baseline and Meridian.

The study is part of the environmental review process for a proposed low density residential development project on the property. The City of Victorville, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of the study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or around the project area.

In order to identify such resources, CRM TECH initiated a historical/archaeological resources records search and a Native American Sacred Lands File search, pursued historical background research, and carried out a systematic field survey. As a result of these research procedures, a previously recorded archaeological site of historical origin, 36-006533 (CA-SBR-6533H), was identified within the project boundaries. When first recorded in 1990-1993, the site was described as a historic-period refuse scatter of poor integrity, and the integrity of the artifact deposit has been further compromised today through recent disturbances, so much so that only a few artifacts remain present on the surface.

Due to the lack of any documented historical association and the minimal archaeological data potential, Site 36-006533 does not appear eligible for listing in the California Register of Historical Resources. Therefore, it does not meet CEQA's definition of a "historical resource." Since no other cultural resources were encountered within the project area, CRM TECH recommends to the City of Victorville a finding of *No Impact* regarding "historical resources."

No further cultural resources investigation is recommended for the project unless development plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are encountered during future earth-moving operations in the project area, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

Impact Analysis

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

Per the above discussion and definition, no archaeological sites or isolates were recorded within the project boundaries; thus, none of them requires further consideration during this study. In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the project:

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

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

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

Additionally, as part of the AB 52 consultation process, the City received a response from the San Manuel Band of Mission Indians requesting the following mitigation measures in addition to MMs **TCR-1** and **TCR-2** identified under Section XVIII, Tribal Cultural Resources below:

***CUL-2*** ***In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.***

***CUL-3*** ***If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.***

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

c. *Less Than Significant With Mitigation Incorporated* – As noted in the discussion above, no available information suggests that human remains may occur within the Area of Potential Effect (APE) and the potential for such an occurrence is considered very low. Human remains discovered during the project will need to be treated in accordance with the provisions of HSC §7050.5 and PRC §5097.98, which is mandatory. State law (Section 7050.5 of the Health and Safety Code) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered adequate mitigation for potential impacts, the following mitigation measure shall be implemented in relation to discovery and treatment of human remains:

***CUL-4 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 para. 7050.5 and that code enforced for the duration of the project.***

With the incorporation of the above mitigation measure, potential for impact to discovery and treatment of human remains will be reduced to a less than significant level. No additional mitigation is required.

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

SUBSTANTIATION

a. *Less Than Significant With Mitigation Incorporated* – During construction, the proposed project will utilize construction equipment that is CARB approved, minimizing emissions generated and electricity required to the extent feasible (as outlined under Section III, Air Quality, above). As stated in Section III, Air Quality, the construction of the proposed TTM 20500 Project would require mitigation measures to minimize emissions impacts from construction equipment use (refer to MM **AQ-1 and AQ-2**). These mitigation measures also apply to energy resources as they require equipment not in use for 5 minutes to be turned off, and for electrical construction equipment to be used where available. These measures would prevent a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARB regulations regarding energy efficiency.

This project proposes to develop a 210-Lot Single-Family Residential Project and energy consumption related to such use encompasses many different activities. For example, construction can include the following activities: delivery of equipment and material to a site from some location (note it also requires energy to manufacture the equipment and material, such as harvesting, cutting and delivering wood from its source); employee trips to work, possibly offsite for lunch (or a visit by a catering truck), travel home, and occasionally leaving a site for an appointment or checking another job; use of equipment onsite (electric or fuel); and sometimes demolition and disposal of construction waste. To minimize energy costs of construction debris management, mitigation has been established to require diversion of all material capable of being recycled. As stated above, energy consumption by equipment will be reduced by requiring shutdowns when equipment is not in use after five minutes and ensuring equipment is being operated within proper operating parameters (tune-ups) to minimize emissions and fuel consumption. These requirements are consistent with State and regional rules and regulations. Under the construction scenario outlined above, the proposed project will not result in wasteful, inefficient, or unnecessary energy consumption during construction.

The proposed project will be supplied electricity by Southern California Edison (SCE) through the power distribution system located adjacent to the site. The SCE system locally consists of major transmission lines on the east edge of the property and local power distribution lines at the southwest corner of the property adjacent to Walmart. SCE will be able to supply sufficient electricity. Natural gas would be supplied by Southwest Gas. The site will connect to the existing natural gas line near the project site. As such, the amount of electricity and natural gas required by the project is considered modest. Furthermore, mitigation measures (MMs **AQ-1** and **AQ-2**) identified under Section III, Air Quality, above indicate that the proposed project will further encourage energy efficiency, including being plumbed for solar energy, which could minimize operational energy use even further than through the mandatory energy efficiency requirements discussed below. However, the proposed structures must be constructed in conformance with a variety of existing energy efficiency regulatory requirements or guidelines including:

- Compliance with Title Chapter 6 of the California Code of Regulations with respect to energy efficiency standards for new building construction.
- Both federally and non-federally regulated appliances shall abide by the efficiency standards of Title 20, Section 1601 et seq. of the California Code of Regulations.
- Compliance California Green Building Standards Code, AKA the CALGreen Code (Title 24, Part 11), which became effective on January 1, 2017. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of building through the use of building concepts encouraging sustainable construction practices.
- The provisions of the CALGreen code apply to the planning, design, operation, construction, use, and occupancy of every newly construction building.
- Compliance The Building Energy Efficiency Standards (CBSC) would ensure that the building energy use associated with the proposed project would not be wasteful or unnecessary.
- Compliance with Indoor Water use consumption reduced through the maximum fixture water use rates.
- Compliance with diversion of construction and demolition materials from landfills.
- Compliance with SBDC Water Efficient Landscape Ordinance Chapter 83-10 – Landscaping Standards.
- Compliance with SBDC Chapter 83.07 – Glare & Outdoor Lighting.
- Compliance with AQMD Mandatory use of low-pollutant emitting finish materials.
- Compliance with AQMD Rules 431.1 and 431.2 to reduce the release of undesirable emissions.
- Compliance with diesel exhaust emissions from diesel vehicles and off-road diesel vehicle/equipment operations.

Compliance with these regulatory requirements for operational energy use and construction energy use would not be wasteful or unnecessary use of energy. Further, SCE is presently in compliance with State renewable energy supply requirements (more than 30% of energy being supplied by renewable energy sources) and SCE will supply electricity to the project. Under the operational scenario for the proposed project, the proposed project will not result in wasteful, inefficient, or unnecessary energy consumption that could result in a significant adverse impact to energy issues based on compliance with the referenced laws, regulations and guidelines. No mitigation beyond that identified above are required.

b. *Less Than Significant With Mitigation Incorporated* – Based on the analysis in the preceding discussion, the proposed project will not conflict with current State energy efficiency or electricity supply requirements or any local plans or programs for renewable energy or energy efficiency requirements. The City of Victorville has adopted State energy efficiency standards as part of its Municipal Code. No mitigation beyond that identified in the preceding paragraphs are required.

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

SUBSTANTIATION: Some of the information provided in this Section is abstracted from the following report: *"Preliminary Geotechnical Investigation Tentative Tract 16681 Victorville, California"* prepared by LOR Geotechnical dated December 22, 2021, revised March 20, 2023. Please note that TTM 16681 has been renamed TTM 20500. This report is provided as Appendix 4 to this Initial Study.

a. i. Ground Rupture

*No Impact* – According to the regulatory map, data obtained from the California Department of Conservation (DOC) showing Alquist-Priolo Earthquake Fault Zones and other seismic hazards (Figure VII-1) and the LOR geotechnical report, the proposed project site is not located in an area that has been mapped as containing geologic hazards, and therefore is not located in an Alquist Priolo Earthquake Fault Zone. The nearest fault zone is the North Fontal fault zone about 13.3 miles to the south and the Helendale Fault Zone approximately 15.5 miles to the northeast. As such, the project site and general area do not contain any known faults, active or inactive. Therefore, no

potential exists for the proposed project site to experience any fault rupture along a delineated active fault.

ii. Strong Seismic Ground Shaking

*Less Than Significant Impact* – The proposed project site, as with most of southern California, is in a seismically active area, and will most likely be subject to some groundshaking during the life of the occupancy of the TTM 20500 Project. According to both the San Bernardino County Land Use Plan General Plan Geologic Hazard Overlay map (Figure VII-2) and the Geotechnical Report, the proposed project is not located in close proximity to any delineated active faults. However, due to the proximity of the known active faults referenced above, the project site and area can be exposed to significant ground shaking during major earthquakes on either of regional faults. According to the Geotechnical Report "future development at the subject site should anticipate that moderate to large seismic events could occur very near the site." As a result, and like all other development projects in the City and throughout the Southern California Region, the proposed project will be required to comply with all applicable seismic design standards contained in the 2019 California Building Code (CBC), Chapter 17, including Section 1613 Earthquake Loads. Compliance with the CBC will ensure that structural integrity will be maintained in the event of an earthquake. Therefore, impacts associated with strong ground shaking will be less than significant without mitigation.

iii. Seismic-Related Ground Failure Including Liquefaction

*No Impact* –According to the Geotechnical Report, the site is underlain by relatively dense alluvial materials, based on the soil tests, and the depth to current groundwater levels is in excess of 50 feet. Therefore, it is not anticipated that the proposed project would be susceptible to seismic-related ground failure, including liquefaction. No impacts are anticipated and no mitigation is required.

iv. Landslides

*No Impact* – According to the San Bernardino County Land Use Plan General Plan Geologic Hazard Overlay map (Figure VII-2) and the Geotechnical Report, the project site is not located in an area with any known earthquake induced landslide hazards. Specifically, no large, exposed, loose, or unrooted boulders are present above the site that could affect the integrity of the site. Based on a site reconnaissance the project site is essentially flat and the surrounding topography is essentially flat. Therefore, the project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts under this issue are anticipated and no mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – The project site is vacant with disturbed, native vegetation coverage; the site has been historically vacant and undeveloped. City grading standards, best management practices and the Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) are required to control the potentially significant erosion hazards from disturbing the site. The topography is generally flat. It is anticipated that any required soil excavation will be reused on site, i.e., the site will balance for grading purposes. During project construction when soils are exposed temporary soil erosion could occur, which could be exacerbated by wind and/or rainfall. Project grading would be managed through the preparation and implementation of a SWPPP during construction. A WQMP will be required to implement best management practices to achieve concurrent water quality controls after construction is completed and the TTM 20500 Project is occupied. The following mitigation measures or equivalent BMPs shall be implemented to address these issues:

***GEO-1 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. Where covering is not possible, measures such as the use of straw bales or sand bags shall be used to capture and hold eroded***

***material on the project site for future cleanup such that erosion does not occur.***

***GEO-2 Excavated areas shall be backfilled and compacted such that erosion does not occur. Paved areas disturbed by this project shall be repaved in such a manner that roadways and other disturbed areas are returned to the pre-project conditions or better.***

***GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) will be sprayed with water or soil binders twice a day or more frequently if fugitive dust is observed migrating from parcel where the Project is being installed.***

***GEO-4 The length of trench which can be left open at any given time will be limited to that needed to reasonably perform construction activities. This will serve to reduce the amount of backfill stored onsite at any given time.***

Implementation of these measures and implementation of the SWPPP/WQMP and associated BMPs will ensure that construction activities and long-term operations will not generate surface runoff that could cause significant erosion or loss of topsoil at the site or downstream.

c. *Less Than Significant Impact* – Refer to the discussion under VII(a) above. Potential instability associated with slope stability and liquefaction related to the project was determined to be negligible, as the project is not identified by the Geotechnical Report, DOC map provided as (Figure VII-1) and by the San Bernardino County General Plan, General Land Use Plan with Geologic Overlays (Figure VII-2) as being located within a liquefaction or landslide hazard zone. The potential for shrinkage or seismically-induced settlement at the site will be limited due to the dense, coarse alluvial materials at the site. The risk for subsidence or settlement at the site is considered low because the soils within the project site do not contain substantial nutrients or organic matter, and are not of a clay type, and as such are not particularly susceptible to subsidence. Given that the project site will be graded, filled, and compacted in accordance with the City's grading standards, and that no known geological hazards exist within the project site, the potential for significant soil instability is minimal. Therefore, the potential for the project to be located on a geologic unit or soil that is unstable or for the project to cause the soils to become unstable is considered less than significant. No mitigation is required.

d. *Less Than Significant Impact* – According to the United States Department of Agriculture (USDA) Web Soil Survey map, the proposed project site is located on fine sand, 2 to 5 Percent Slopes. Expansive soils are generally of a clay type soil, not a sandy soil such as the fine sand series soils that underlay the project site. Compliance with the 2020 California Building Code (CBC) is sufficient to ensure that the proposed structures will conform to the underlying soils and thereby be constructed safely as habitable structures. Thus, based on the absence of clay-type soils on site, the proposed project would have a less than significant potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

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

f. *Less Than Significant With Mitigation Incorporated* – The potential for discovering paleontological resources during development of the project is considered low based on the young alluvial sediments underlying the project site. No unique geologic features are known or suspected to occur on or beneath the site. However, because paleontological resources are located beneath the surface and can only be discovered as a result of ground disturbance activities, the following measure shall be implemented:

***GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.***

With incorporation of this contingency mitigation, the potential for impact to paleontological resources will be reduces to a less than significant level. No additional mitigation is required.

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

SUBSTANTIATION: The GHG impact forecast is abstracted from this study: *"Victorville Residential Greenhouse Gas Analysis, City of Victorville"* prepared by Urban Crossroads dated October 23, 2023. The Urban Crossroads' study can be found in Appendix 5 to this document.

Background

The GHG emissions that will be generated by the proposed project during construction and operation are summarized in Tables III-4 and III-5. The estimated emissions of greenhouse gases for each year of construction and total annual operational emissions are well below the applicable MDAQMD significance thresholds. Refer to Tables III-4 and III-5.

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. Many scientists believe that the climate shift taking place since the industrial revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of greenhouse gases in the earth's atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of greenhouse gases resulting from human activity and industrialization over the past 200 years.

An individual project like the project evaluated in this GHGA cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. However, the project may participate in the potential for GCC by its incremental (cumulative) contribution of greenhouse gasses combined with the cumulative increase of all other sources of greenhouse gases, which when taken together constitute potential influences on GCC.

AB 32 is one of the most significant pieces of environmental legislation that California has adopted. Among other things, it is designed to maintain California's reputation as a "national and international leader on energy conservation and environmental stewardship." It will have wide-ranging effects on California businesses and lifestyles as well as far reaching effects on other states and countries. A unique aspect of AB 32, beyond its broad and wide-ranging mandatory provisions and dramatic GHG reductions are the short time frames within which it must be implemented. Major components of the AB 32 include:

- Require the monitoring and reporting of GHG emissions beginning with sources or categories of sources that contribute the most to statewide emissions.
- Requires immediate "early action" control programs on the most readily controlled GHG sources.
- Mandates that by 2020, California's GHG emissions be reduced to 1990 levels.
- Forces an overall reduction of GHG gases in California by 25-40%, from business as usual, to be achieved by 2020.
- Must complement efforts to achieve and maintain federal and state ambient air quality standards and to reduce toxic air contaminants.

Statewide, the framework for developing the implementing regulations for AB 32 is under way. Maximum GHG reductions are expected to derive from increased vehicle fuel efficiency, from greater use of renewable energy and from increased structural energy efficiency. Additionally, through the California Climate Action Registry (CCAR now called the Climate Action Reserve), general and industry-specific protocols for assessing and reporting GHG emissions have been developed. GHG sources are categorized into direct sources (i.e., company owned) and indirect sources (i.e., not company owned). Direct sources include combustion emissions from on-and off-road mobile sources, and fugitive emissions. Indirect sources include off-site electricity generation and non-company owned mobile sources.

Thresholds of Significance

According to the MDAQMD's *CEQA and Federal Conformity Guidelines*, a project is significant if it triggers or exceeds the most appropriate evaluation criteria. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 tons CO2e (90,718.5 MT CO2e) per year is sufficient (42). 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.

The City has prepared a Climate Action Plan (CAP), which provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate (43). In order to determine consistency with the CAP, the City of Victorville provided a Screening Table to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP contains a menu of measures potentially applicable to discretionary development that include energy conservation, water use reduction, increased residential density or mixed uses, transportation management and solid waste recycling. Individual sub-measures are assigned a point value within the overall Screening Table of GHG implementation measures. The point values are adjusted according to the intensity of action items with modest adoption/installation (those that reduce GHG emissions by modest amounts) worth the least number of points and greatly enhanced adoption/installation worth the most. Projects that garner at least 100 points are determined to be consistent with the CAP and do not require quantification of project specific GHG emissions. Projects that are consistent with adopted CAPs are also considered to support and would not conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Based on the City of Victorville CAP, a Project that garners at least 100 points from the CAP Consistency Checklist are determined to be consistent with the CAP and do not require quantification of project specific GHG emissions. Additionally, the MDAQMD has determined that a project that emits less than 90,718.5 MT CO2e/yr is not considered a substantial GHG emitter and the GHG impact would be less than significant. On the other hand, if a project would emit GHG emissions in excess of 90,718.5 MT CO2e/yr could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. While the MDAQMD threshold is not used for determining significance, the threshold is used for informational purposes.

Impact Analysis

a. *Less Than Significant Impact* – Project construction activities would generate CO2 and CH4 emissions. The report *Victorville Residential Air Quality Impact Analysis Report* (Urban Crossroads, Inc.) contains detailed information regarding Project construction activities (45) (46). As discussed in the AQIA, construction related emissions are expected from the following construction activities:
   - Site Preparation
   - Grading
   - Building Construction
   - Paving
   - Architectural Coating

The construction duration and equipment assumptions are provided in Tables 3-1 and 3-2 of Appendix 5.

Construction Emissions Summary

For construction phase project GHG emissions, GHGs are quantified and amortized over the life of the project. MDAQMD follows the SCAQMD recommendation in calculating total construction GHG emissions by amortizing the emissions over the life of the project by di viding it by a 30-year project life then adding that number to the annual operation phased GHG emissions. Accordingly, construction emissions were amortized or a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are summarized in Table VIII-1.

**Table VIII-1**
**AMORTIZED ANNUAL CONSTRUCTION EMISSIONS**

| Year | Emissions (MT/yr) | | | |
|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | Total $CO_2e$ |
| 2022 | 216.99 | 0.07 | 0.00 | 218.77 |
| 2023 | 856.76 | 0.18 | 0.01 | 864.20 |
| Total Annual Construction Emissions | 1,073.76 | 0.25 | 0.01 | 1,082.97 |
| **Amortized Construction Emissions ($MTCO_2e$)** | **35.79** | **0.01** | **0.00** | **36.10** |

Source: CalEEMod, Appendix 3.1

Source: Urban Crossroads, Victorville Residential GHG Analysis, November 16, 2021

Operational and Total Emissions Summary

Operational activities associated with the proposed project will result in emissions of CO2, CH4, and N2O from the following primary sources: Building energy use; water supply, treatment and distribution, solid waste and mobile source emissions; with the latter dominating future operational emissions. Detailed descriptions of each source of operational emissions are described on page 30 of Appendix 5. As shown on Table VIII-2, without accounting for regulatory requirements and PDF's, the project would result in 2,966.77 MTCO2e/year. When compared to the MDAQMD GHG threshold of 90,718 MTCO2e/year, these GHG emissions are not considered to be a significant adverse impact.

**Table VIII-2**
**PROJECT GHG EMISSIONS SUMMARY (ANNUAL)**

| Emission Source | Emissions (MT/yr) | | | |
|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | Total $CO_2e$ |
| Annual construction-related emissions amortized over 30 years | 35.79 | 0.01 | 0.00 | 36.10 |
| Area Source | 151.41 | 0.01 | 0.00 | 152.36 |
| Energy Source | 613.62 | 0.03 | 0.01 | 617.03 |
| Mobile Source | 1,945.53 | 0.12 | 0.11 | 1,979.97 |
| Waste | 50.02 | 2.96 | 0.00 | 123.92 |
| Water Usage | 45.74 | 0.36 | 0.01 | 57.39 |
| **Total $CO_2e$ (All Sources)** | **2,966.77** | | | |
| **MDAQMD Threshold** | **90,718.5** | | | |
| **Significant?** | **No** | | | |

Source: CalEEMod, Appendix 3.1
-- = Emission factor only provided in MT $CO_2e$

Source: Urban Crossroads, Victorville Residential GHG Analysis, November 16, 2021

City of Victorville CAP Checklist

As previously stated, the purpose of the City of Victorville GHG CAP is to provide guidance in selecting and accounting for the reduction in GHG emissions attributable to certain design and construction measures incorporated into a project. The CAP Checklist assigns points for each option incorporated into a project. The point values correspond to the minimum emissions reduction expected from each feature. Each project must achieve a minimum of 100 points to be considered consistent with the CAP emission targets. The menu of features allows a developed maximum flexibility and options for how dev elopement projects can implement the GHG reduction measures. Table 3-5 of the CAP presents a list of the GHG reduction measure options in the CAP that apply to the proposed project and the associated point values in the GHG Checklist. Based on the CAP Checklist findings in Appendix 5, the project would yield 108 points, which is consistent with the City's CAP requirements. Compliance with the CAP fulfills the description of mitigation found in CEQA Guidelines para. 15130(a)(3) and para. 15183.5.

b. *Less Than Significant Impact* – Based on the data presented in Appendix 5 and specifically Table 3-5 of Appendix 5, the proposed project will not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

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

SUBSTANTIATION: Some of the information provided in this Section is abstracted from the following report: *"Phase I Environmental Site Assessment Tentative Tract Map 16681…California"* prepared by LOR Geotechnical dated December 6, 2021. Please note that TTM 16681 has been renamed TTM 20500. This report is provided as Appendix 6 to this Initial Study.

a&b. *Less Than Significant With Mitigation Incorporated* – The project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or may 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. During construction there is a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people and the environment. The following mitigation measure will be incorporated into the Storm Water Pollution Prevent Plan (SWPPP) prepared for the project and implementation of this measure can reduce this potential hazard to a less than significant level.

***HAZ-1*** ***All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The conta-***

***minated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.***

The project consists of 210 single-family residences and associated infrastructure; occupancy of the site would not involve the use of a substantial volume of hazardous materials. Household cleaning supplies would be used in small quantities to support this single-family residential neighborhood. Compliance with all Federal, State, and local regulations governing the storage and use of hazardous materials is required, and will ensure that the project operates in a manner that poses no substantial hazards to the public or the environment. No further mitigation is required.

c. *Less Than Significant With Mitigation Incorporated Impact* – The project site is not located within one-quarter mile from a public school. The nearest school is Silverado High School located about one-half mile to the east. Regardless, as stated above under issues IX(a) and (b), above, the proposed project is not of a type that would handle or emit hazardous materials such that the students and faculty of the nearby school would be adversely impacted. As stated above, compliance with all Federal, State, and local regulations governing the storage and use of hazardous materials is required, and will ensure that the project operates in a manner that poses no substantial hazards to the public or the environment. Furthermore, during construction, mitigation measure (MM) **HAZ-1** above would ensure that any accidental spills of hazardous materials are remediated, posing no significant threat to students and faculty members of any school. Based on this information, implementation of the project will have a less than significant potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. *No Impact* – The project site consists of vacant land containing disturbed native and non-native vegetation, consistent with the remnants of the rural desert character that can be found throughout undeveloped parcels within and around the City of Victorville. The project will not be located on a site that is included on a list of hazardous materials sites that are currently under remediation. According to the California State Water Board's GeoTracker website (consistent with Government Code Section 65962.5), which provides information regarding Leaking Underground Storage Tanks (LUST) and other cleanup program sites, there are no open clean-up sites within 2,500 feet of the project site (Figure IX-1).

e. *No Impact* – The project site is not located within two miles of an airport or private airstrip. The closest airport is the Southern California Logistics Airport (SCLA), which is located approximately three miles northeast of the project site; the Project is not located within the SCLA Airport Planning Area and Airport Safety Review Area, as shown on Figure IX-2, and Figure IX-3, which depicts the Airport Safety Review Area by the San Bernardino County Land Use Plan General Plan Hazard Overlays. Therefore, no impacts are anticipated under this issue and no mitigation is required.

f. *Less Than Significant With Mitigation Implementation* – The City of Victorville General Plan Emergency/Public Safety Facilities Location Map (Figure IX-4), indicates that, in the vicinity of the project, Highways 395 and 14 are delineated as emergency response/evacuation routes. The two adjacent roadways, Mesa Linda and Seneca, do not function as evacuation routes; therefore, the proposed project's offsite improvements to these two roadways will not have a direct adverse impact to emergency response/evacuation routes. Access to the site will be provided through new entryways along Mesa Linda and Seneca. The proposed onsite parking and circulation plans will be reviewed by the local Fire Department and Police Department to ensure that the project's ingress/egress onsite are adequate for accommodating emergency vehicles. Because the proposed project will require construction within adjacent roadways, a limited potential to interfere with emergency response or an evacuation plan can occur during construction. Mitigation to address traffic disruption and emergency access issues are included in the Transportation Section. Therefore, with the implementation of

mitigation identified in the Transportation Section of this document, there is a less than significant potential for the development of the project to physically interfere with any adopted emergency response plans, or evacuation plans. No mitigation is required.

g. *Less Than Significant Impact* – According to the San Bernardino County Land Use Plan General Plan Hazard Overlays (Figure IX-3), there are no fire safety overlay districts delineated by the County. Furthermore, according to CALFIRE, there are no fire hazard zones within the City of Victorville that are of state responsibility (Figure IX-5); there are also no fire hazard zones within a local responsibility area.[1] The proposed project is located in a flat urban area with residential and commercial development occurring in the surrounding area, and with native desert vegetation within and surrounding the site to the south and west. This is an area with very little fuel load in the surrounding area that could be susceptible to wildfires. Therefore, because the proposed project is located outside of the area identified as a high fire hazard zone by CALFIRE, the proposed project has a less than significant potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires. No mitigation is required.

[1] https://gis.data.ca.gov/datasets/CALFIRE-Forestry::fhsz-in-lra?geometry=-117.868%2C34.263%2C-116.833%2C34.462

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

SUBSTANTIATION: Some of the information provided in this Section is abstracted from the following report: *"Mojave River Watershed Water Quality Management Plan For: Tract 20500"* prepared by Ludwig Engineering Associates, Inc. dated February 11, 2022. This report is provided as Appendix 7 to this Initial Study.

a. *Less Than Significant With Mitigation Incorporated* – The proposed project is located within a developed area within the Mojave River watershed, which is within the Lahontan Regional Water Quality Control Board's (RWQCB) jurisdiction. The City of Victorville Water District (VWD) is responsible for the water supply to the City. VWD currently pumps potable water supplies from groundwater in Mojave Groundwater Basin and purchases water from MWA's Regional Recharge and Recovery Project, when available. VWD is required to meet potable water quality requirements of the Division of Drinking Water, State Water Resources Control Board (SWRCB), as well as the California Department of Public Health.

Typically, the three main sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater, stormwater runoff, and potential discharges of pollutants, such as accidental spills. Municipal wastewater is delivered to the Victor

Valley Water Reclamation Authorities (VVWRA) Wastewater Treatment Plant through the City's sewer collection system consisting of approximately: 430 miles of mains and trunk lines. The VVWRA WTP treats about 10.7 million gallons of wastewater per day (MDG) and currently meets the waste discharge requirements imposed by the RWQCB. To address stormwater and accidental spills within this environment, any new project must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) and a National Pollutant Discharge Elimination System (NPDES) Water Quality Management Plan (WQMP) to control potential sources of water pollution in stormwater runoff that could violate any standards or discharge requirements during construction (short term) and future occupancy (long term) to ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term.

Appendix 7 provides the WQMP under the Phase II Small MS4 General Permit for the Mojave River Watershed. The WQMP provided specifies stormwater runoff permit Best Management Practices (BMPs) requirements for capturing, retaining, and treating on site stormwater (in two bioretention basins) once the residential subdivision has been developed. Because the project site currently consists of pervious surfaces, the project has identified onsite drainage that will generally be directed to two onsite bioretention basins that will be installed to handle the two-year 24-hour storm event and mitigate the difference between the Pre- and Post- 100-year volume of stormwater runoff. The WQMP prepared for the project will include measures to minimize urban runoff from impacting receiving waters to the Maximum Extent Practicable (MEP). This is a requirement of the County and City, which enforces the RWQCB's measure to protect the watershed. These measures include development of two bioretention basins that will collect and treat runoff generated within the project site. These measures can reduce potential impacts to receiving waters to a less than significant level.

The SWPPP would specify the BMPs that the project would be required to implement during construction activities to ensure that all potential water pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. With implementation of these mandatory plans and their BMPs, as well as mitigation measure (MM) **HAZ-1** above, the development of the TTM 20500 Project will not cause a violation of any water quality standards or waste discharge requirements.

b. *Less Than Significant Impact* – Implementation of the proposed project will not deplete groundwater supplies that would substantially affect the water availability for existing or planned land uses or biological resources. Given that the project does not require extensive excavation, the potential to intercept groundwater during grading of both the project site and offsite roadways is considered to be less than significant. The groundwater basin would not be physically altered or impacted as a result of the proposed project. The design of the drainage and retention facilities of the proposed project would offset much of the loss of the existing pervious surface at the site.

The TTM 20500 Project is a single-family residential project that will consist of 210 new residences. The project would be supplied with water by VWD that uses groundwater in Mojave Groundwater Basin and purchases water from MWA's Regional Recharge and Recovery Project, when available, to meet primary customer demand. The District's Urban Water Management Plan (2015)[2] identifies sufficient water resources to meet demand in its service area. The total supply for VWD in 2015 for retail customers, was 21,454 acre-feet (AF) in 2015, while the demand was 20,843 AF. According to VWD, the City assumed a use of 202 gallons of water per capita per day. The proposed project would accommodate a population approximately 735 persons; this is because, according to the Southern California Association of Governments (SCAG)[3] Local Profile for the City of Victorville indicates that the 2018 average household size for the City was 3.5, and the proposed project consists of 210 residences (3.5 x 210 = 735). Therefore, the demand for potable water by the proposed project is anticipated to be 154,934 gallons per day (GPD), equivalent to about 173.7 AF per year (AFY). Based on the projected water demand for single-family uses within the VWD retail service area for 2025, 18,291 AFY, and for 2040, 23,867 AFY, it is anticipated that the additional 173.7 AFY demanded by

[2] https://www.victorvilleca.gov/home/showdocument?id=209
[3] https://www.scag.ca.gov/Documents/Victorville.pdf

the project can be accommodated into the future, particularly given that the overall available water supply is anticipated to be 32,627 AFY in 2025 (5,860 AF above overall demand), and 40,788 AFY in 2040 (5,860 AF above overall demand). The anticipated available water supply within VWD's service area is anticipated to be greater than the demand for water in the future, which indicates that VWD has available capacity to serve the proposed project without significant adverse impacts on area groundwater basins.

While the development of the project may result in a slight reduction in the amount of surface runoff recharge associated with natural runoff, this reduction is expected to be off-set/replaced by infiltration from the onsite bioretention basins, as well as the required onsite landscaping. The development of the project will, therefore, not substantially interrupt the existing percolation of the site, or any flow of groundwater under the project site. Impacts to groundwater resources are forecast to be less than significant from implementing the TTM 20500 Project. No mitigation is required.

c i. Result in substantial erosion or siltation onsite or offsite?

*Less Than Significant Impact* – Based on the WQMP provided in Appendix 7, the proposed project is not anticipated to significantly change the volume of flows downstream of the project site, and would not be anticipated to change the amount of surface water in any water body in an amount that could initiate a new cycle of erosion or sedimentation downstream of the project site. The onsite drainage system will capture the incremental increase in runoff from the project site associated with project development. Onsite flows will be captured in the proposed onsite biofiltration basins. These systems will be designed to capture the 2-year 24-hour storm event flows and mitigate the difference between the pre- and post-100-year volume runoff. Treated surface runoff will be discharged in conformance with San Bernardino County and City of Victorville requirements. The downstream drainage system will not be substantially altered given the control of future surface runoff from the project site; thus, the potential for downstream erosion or sedimentation will be controlled to a less than significant impact level.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?

*Less Than Significant Impact* – The proposed project will not alter the existing drainage discharged downstream of the project site. The drainage patterns onsite will be modified to capture stormwater runoff but will maintain the existing offsite downstream drainage system through control of future discharges from the site, which would prevent flooding onsite or offsite from occurring. Thus, the implementation of onsite drainage improvements and applicable requirements will ensure that stormwater runoff will not substantially increase the rate or volume of runoff in a manner that would result in flooding on- or off-site. Impacts under this issue are considered less than significant with no mitigation required.

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

*Less Than Significant With Mitigation Incorporated* – As indicated above, the project will not substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater capacity, or provide substantial additional sources of polluted water, particularly because the site plan includes water quality control BMPs that will collect and treat on-site runoff. The project will require the implementation of a SWPPP and WQMP, and implementation of mitigation measure **HAZ-1**, which will ensure that discharge of polluted material does not occur or is remediated in the event of an accidental spill. At present, the site is mostly pervious and runoff is either retained on site or is directed into a downstream channel; therefore, with the development of the site as proposed and through development of the planned drainage systems, runoff from the site would be managed more efficiently than that which exists at present. Thus, the implementation of onsite drainage improvements and applicable requirements will ensure that that drainage and stormwater will not create or contribute runoff that would exceed the capacity of existing or planned offsite stormwater

drainage systems or provide substantial additional sources of polluted runoff. Impacts under this issue are considered less than significant with implementation of mitigation.

iv. Impede or redirect flood flows?

*Less Than Significant Impact* – According to the San Bernardino County Land Use Plan General Plan Hazard Overlays (Figure IX-3), the proposed development area of the project is not located in a 100-year or 500-year flood hazard area. Furthermore, development of this site is not anticipated to redirect or impede flood flow at the project site, particularly given that surface flows on site will be directed to the onsite drainage features which will be capable of intercepting the incremental increase in the 100-year flow rate from the project site or otherwise be detained on site and discharged in conformance with San Bernardino County requirements. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – Please refer to response IX(c) above. The proposed development area of the project is not located within a flood hazard, tsunami, or seiche zone. As stated above, the project site is located at the southwest corner of Seneca and Mesa Linda. During construction, runoff will be managed through implementation of a SWPPP and Water Quality Management Plan (WQMP), and implementation of MM **HAZ-1**, which will ensure that the risk of release of pollutants from the project site is less than significant. The project is located more than 70 miles from the Pacific Ocean, which eliminates the potential for a tsunami to impact the project area. Additionally, a seiche would not occur within the vicinity of the project because no lakes or enclosed bodies of water exist near or upstream of the site that could be impacted by such an event. Finally, according to the San Bernardino County Land Use Plan General Plan Hazard Overlays (Figure IX-3), the proposed project is located outside of the area of inundation related to the Mojave River channel. As such, with the implementation of MMs **HAZ-1** above, the proposed project would have a less than significant potential to risk release of pollutants due to project inundation.

e. *Less Than Significant Impact* – Please refer to the discussion under issue X(b) above. The "2018 Sustainable Groundwater Management Basin Prioritization: Process and Results" document, prepared by the State of California Department of Water Resources[4], indicates that the Mojave River Basin, which underlies the proposed project, is under very low priority. As stated in the 2018 Basin Prioritization, of the 517 groundwater basins in California, 109 are prioritized as high and medium and 408 are prioritized as low and very low. The Mojave River Basin does not have a sustainable groundwater management plan and the project will not interfere with the overall water quality of the basin as discussed above due to the Judgment allocating groundwater resources within the Basin. Though the Groundwater Basin has several sub-basins that experienced overdrafts in 2017-2018[5], the Watermaster replaces overdrafts through fees collected from water users that is used to purchase additional water supplied through the State Water Project. Furthermore, compliance with the State water conservation measures is enforced through VWD. As such, it is not anticipated that the proposed TTM 20500 Project would have a significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

[4] https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Basin-Prioritization/Files/2018-Sustainable-Groundwater-Management-Act-Basin-Prioritization.pdf
[5] http://www.mojavewater.org/files/25AR1718_Revised.pdf

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

SUBSTANTIATION

a. *No Impact* – Refer to the aerial photo provided as Figure 4, which depicts the project's site-specific location. The project site would be installed within a site zoned for Single-Family Residential use, and the land use designation (General Plan) is the same. The project is located within a vacant site, with single-family residential development and vacant land uses in all directions, except to the south. The project site consists of vacant land containing disturbed native and non-native vegetation, consistent with the remnants of the rural desert character that can be found throughout undeveloped parcels within the City of Victorville. The development of a single-family residential development at this location would be consistent with both the uses surrounding the project and the surrounding land use designations and zoning classifications. Consequently, the development of the project site with the proposed use will not divide any established community in any manner. Therefore, no significant impacts under this issue are anticipated and no mitigation is necessary.

b. *Less Than Significant Impact* – The project site encompasses about 60.6-acres, and it is zoned for Single Family Residences, where up to 6 dwelling units per acre are allowed. The project proposes a total of 210 units at a density of about 3.6 dwelling units per acre with approval of TTM 20500, the proposed TTM 20500 Project will be fully consistent the General Plan Land Use Map. Therefore, the implementation of this project at this site is consistent with the City's General Plan. Based on the preceding information, implementation of the proposed project would not 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, zone classification, or the City's Municipal Code) adopted for the purpose of avoiding or mitigating an environmental effect. No adverse impacts are anticipated under this issue and no mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|---|---|---|---|
| **XII. MINERAL RESOURCES**: Would the project: | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☒ |

SUBSTANTIATION:

a&b. *No Impact* – The proposed project will be developed within a vacant site that is designated for single-family density residential use, which is a designation that does not include mining operations as a permitted use. A review of the Victorville General Plan Resource Chapter indicates that the proposed project is not located within a mineral resource designation (Figure XII-1). The project site has not been previously mined for any mineral/aggregate resources. The project site is currently located in a transitional urban residential area with no known mineral resource uses nearby. No specific plan or other land use plan is in place that would delineate important mineral resources at the project site. Therefore, the development of the project will not cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources within the City. No impacts would occur under these issues. No mitigation is required.

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

SUBSTANTIATION

Noise is generally described as unwanted sound. The proposed project will be developed within a 60.6-acre site. The project is located in a rural- to suburban- transitional zone in the western portion the City of Victorville. The project site consists of vacant land containing disturbed native and non-native vegetation, consistent with the remnants of the rural desert character that can be found throughout undeveloped parcels within the City of Victorville. The primary existing noise sources consist of the Walmart site (southwest of the project site), Highway 395 to the west and Highway 18 to the south. There are no known sensitive noise receptors located in close proximity to the project site.

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

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

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

a. *Less Than Significant With Mitigation Incorporated* – As noted above, the background noise level at the project site is dominated by traffic noise from nearby state highways and the Walmart operation south of the project site. The Noise Element of the City of Victorville General Plan establishes noise quality standards for land use categories based on the State of California Office of Noise Control land use compatibility recommendations. The Noise Element shows the community exposure to noise recommended as normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable for various classes of land use sensitivity. The City of Victorville Land Use Compatibility Standards recommend a Community Noise Exposure of 55-60 dB CNEL as normally acceptable for single-family residential uses.

Short-Term Noise

Short-term construction noise impacts associates with the proposed project will occur in phases dominated by earth moving equipment and small structural construction equipment. The earth-moving sources are the noisiest type of equipment typically ranging from 75 to 90 dB at 50 feet from the source. Refer to Table XIII-1 below, which shows construction equipment noise levels at 25, 50 and 100 feet from the noise source.

**Table XIII-1**
**NOISE LEVELS OF CONSTRUCTION EQUIPMENT AT 25, 50 AND 100 FEET (in dBA LEQ) FROM THE SOURCE**

| Equipment | Noise Levels at 25 feet | Noise Levels at 50 feet | Noise Levels at 100 feet |
|---|---|---|---|
| **Earthmoving** | | | |
| Front Loader | 85 | 79 | 73 |
| Backhoes | 86 | 80 | 74 |
| Dozers | 86 | 80 | 74 |
| Tractors | 86 | 80 | 74 |
| Scrapers | 91 | 85 | 79 |
| Trucks | 91 | 85 | 79 |
| **Material Handling** | | | |
| Concrete Mixer | 91 | 85 | 79 |
| Concrete Pump | 88 | 82 | 76 |
| Crane | 89 | 83 | 77 |
| Derrick | 94 | 88 | 82 |
| **Stationary Sources** | | | |
| Pumps | 82 | 79 | 70 |
| Generator | 84 | 78 | 72 |
| Compressors | 87 | 81 | 75 |
| Other | | | |
| Saws | 84 | 78 | 72 |
| Vibrators | 82 | 76 | 70 |

Source: U.S. Environmental Protection Agency "Noise"

The City's Noise Control Ordinance (Municipal Code Chapter 13.01) controls hours of operation for multiple sources of excessive noise. Noise above 55 dBA is not permitted between the hours of 10:00 PM and 7:00 AM in residential zones, or above 65 dBA between the hours of 7:00 AM or 10:00 PM in residential zones. However, the City exempts construction activity on private properties that are determined by the director of building and safety to be essential to the completion of the project

(Municipal Code Chapter 13.01.060[9]). The City prohibits noise levels that exceed the above listed thresholds by the following dB(A) levels for the cumulative period of time specified:

> *(1) Less than 5dB(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.*

Construction noise is considered a common necessity for new development. Therefore, through compliance with the City's noise standards, short-term construction impacts may expose persons to or generate noise in excess of standards established by the City or by any other applicable agencies; as such, mitigation is outlined below to ensure that noise levels are minimized to a low level at the existing sensitive receptors.

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

***NOI-2*** ***Noise minimizing measures shall be implemented to reduce noise levels to the greatest extent feasible at the nearest receptors, defined as at or below 55 dBA permitted between the hours of 10:00 PM and 7:00 AM; and at or below 65 dBA permitted between the hours of 7:00 AM and 10:00 PM.***

***NOI-3*** ***Equipment not in use for five minutes shall be shut off.***

***NOI-4*** ***Equipment shall be maintained and operated such that loads are secured from rattling or banging.***

Thus, based on the existing noise circumstances within the vicinity of the project (roadway noise), short-term noise impacts are considered less than significant with the implementation of the mitigation measures above.

Long-Term Noise

The long-term or permanent change in noise consists of the additional trips associated with full occupancy of the single-family homes. The proposed project is located along Mesa Linda Road and there are currently no nearby sensitive receptors. The additional trips generated—estimated to be 2,105 trips per day—to the site each day would contribute to a minor change in the existing noise on the project site. Furthermore, the TTM 20500 Project does not include any specific type of operational noise activities or levels beyond the noise sources associated with typical residential land use in the project study area, such as people moving to and from their home, internal vehicle trips, air conditioning units, trash collection, children playing, etc. In addition, the project residential land use is considered a noise-sensitive receiving land use and not as a significant noise generator. Therefore, long-term noise impacts for this residential land use are anticipated to be less than significant. Given that background noise is moderate at present at the project site due to limited traffic and minimal nighttime traffic, and that the proposed project would not contribute significant additional traffic to the surrounding roadways, long-term noise impacts would be less than significant.

With the implementation of the mitigation measures proposed to address construction noise above, the proposed project would have a less than significant potential to result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

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

The FTA Assessment states that in contrast to airborne noise, ground-borne vibration is not a common environmental problem. Although the motion of the ground may be noticeable to people outside structures, without the effects associated with the shaking of a structure, the motion does not provoke the same adverse human reaction to people outside. Within structures, the effects of ground-borne vibration include noticeable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. FTA Assessment further states that it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. However, some common sources of vibration are trains, trucks on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment. The Federal Transit Association (FTA) guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential project related vibration impacts.

Given that there are no vibration sensitive receptors located within one-quarter mile of the project site, temporary vibration levels associated with project construction are forecast to be less than significant. Furthermore, annoyance-related impacts would be short-term and would only occur during site grading and construction activities. Due to the size of the project site, and the lack of any operational uses that would include vibration, the proposed project will not expose people to generation of excessive groundborne vibration or groundborne noise levels during occupancy.

c. *No Impact* – No private airports are located in the vicinity of the project. The closest airport is the Southern California Logistics Airport (SCLA), which is located approximately 3 miles north of the project site; the TTM 20500 Project is not located within the SCLA Airport Planning Area and Airport Safety Review Area, as shown on Figure IX-2 and Figure IX-3, which depicts the Airport Safety Review Area by the San Bernardino County Land Use Plan General Plan Hazard Overlays. Furthermore, according to the City of Victorville General Plan Existing Noise Contour map for SCLA (Figure XIII-1), the entirety of the proposed project site is located outside of the SCLA noise contours. Additionally, the proposed project is located outside of the SCLA Proposed Future (2025) Airport Noise Contours (Figure XIII-2). Therefore, because the proposed project is located outside of the SCLA existing and future noise contours, the proposed project would have no potential to expose people residing or working in the project area to excessive noise levels from nearby airport activity. No mitigation is required.

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

SUBSTANTIATION

a. *Less Than Significant Impact* – The proposed TTM 20500 Project would convert vacant land located within the City of Victorville within the City's Single-Family Residential land use designation. The proposed project will develop 210 single-family homes within a 60.6-acre site. As stated under issue X(b), Hydrology and Water Quality, the proposed project would accommodate a population of about 735 persons; this is because, according to the Southern California Association of Governments (SCAG)[6] Local Profile for the City of Victorville indicates that the 2018 average household size for the City was 3.5. The SCAG Local Profile indicates that the 2018 population of the City was 123,701. SCAG's Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)[7] indicates that the 2040 population within the City of Victorville is projected to be 184,500 persons. Given that the current population of Victorville is about 60,000 persons less than the projected 2040 population, the potential for an additional 735 new residents within the City of Victorville is considered less than significant as the project represents only about 1.3% of the potential growth anticipated between the present population and the City's projected build-out population.

   Additionally, the City of Victorville General Plan indicates that there is a potential for a total of 138,617 housing units in the Planning Area at build-out. The SCAG Local Profile for the City of Victorville indicates that in 2018, the City contained 38,135 housing unit, accommodating approximately 100,000 additional housing units between the present and the City's projected build-out. As such, the addition of 210 residential units would be well within the projected number of households that would be developed by build-out of the City. Further, the project site is being built at a density of 3.6 units per acre, when it could be developed with as many as six units per acre. These units would contribute to the housing needs within the City, which, as determined by the SCAG Regional Housing Needs Assessment Final Allocation Plan 1/1/14-10/1/21,[8] was determined to be 7,371 units.[9] Given the above, the proposed project would not induce population growth beyond that which has been planned for in the City General Plan or SCAG planning documents, or that can be accommodated by the project and the City. Therefore, impacts would be less than significant. No mitigation is required.

b. *No Impact* – There are no existing residences on the property. Therefore, the proposed project will not displace any existing people or residences necessitating construction of replacement housing elsewhere

[6] https://www.scag.ca.gov/Documents/Victorville.pdf
[7] http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf
[8] According to SCAG, "the RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs."; The intent of the future needs allocation by income groups is to relieve the undue concentration of very low and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.
[9] http://www.scag.ca.gov/Documents/5thCyclePFinalRHNAplan.pdf;

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

SUBSTANTIATION

a. *Less Than Significant Impact* – The nearest fire station serving the project is approximately 2 miles east of the project site. The City is served by the Victorville Fire Department, and the Liberty Park fire station is located in Liberty Park, near the intersection of Amethyst and La Mesa Roads. The Victorville Fire Department (SBCFD) provides fire protection and emergency medical services for the City. It would take approximately 3-7 minutes for Victorville Fire Department to reach the site from this station. The proposed project requires a fire protection review, which will ensure that the proposed project is developed in accordance with development standards designed to provide maximum fire protection. The proposed project will incrementally add to the existing demand for fire protection services. Cumulative impacts are mitigated through the payment of the Development Impact Fee (DIF) to the City of Victorville that are dedicated to fire capital improvement costs. Thus, payment of the DIF for fire suppression would offset this incremental demand for fire protection services. Based on the discussion above, and the availability of fire protection services within the City of Victorville, any impacts under this issue are considered less than significant and no mitigation is required.

b. *Less Than Significant Impact* – The City receives police services through the San Bernardino County Sheriff Department. The Victorville Police Department is responsible for providing public safety to a geographical area of approximately 74 square miles with a population of approximately 115,000 residents. The Department enforces local, state, and federal laws; performs investigations and makes arrests; administers emergency medical treatment; and responds to City emergencies. The sheriff station is located at 14200 Amargosa Road, Victorville, CA 92392. Police services are funded through the City's General Fund. The City currently supports capital facilities, including a newly constructed police headquarters building, 35 police vehicles, and equipment such as computers and radios. The project site is located within existing Sheriff patrol routes and future calls can be responded to within the identified priority call target response times. The proposed project will incrementally add to the existing demand for police protection services. The City's General Fund covers operational expenses, and the proposed project will contribute property taxes to the general fund to offset this incremental demand for law enforcement. Additionally, payment of the DIF for police public safety capital improvement costs would offset this incremental demand for police services. Any impacts under this issue are considered less than significant and no mitigation is required.

c. *Less Than Significant Impact* – The proposed project would develop a single-family subdivision with 210 homes, and would generate a new demand for school services within the area. The estimated

school generation rates for the project are as follows based on the generation rates included in the Countywide Plan Draft Program Environmental Impact Report (PEIR):

- The proposed project would generate a total of about 150 students of all grades.

The project area is served by several school districts including the following: Adelanto School District (VESD) and Victor Valley Union High School District (VVUHSD). Payment of fees to the Adelanto and VVUHSD DIF mitigation programs—of which a Certificate of Compliance must be submitted to the City's Development Department as part of the residential building fees with which the project must comply—would be sufficient to accommodate the student growth that would correspond to the overall growth anticipated to occur within the City. As stated under issue IX, Population and Housing, the City anticipates that about 100,000 additional dwelling units may be developed by City buildout. No other mitigation is identified or needed. Since this is a mandatory requirement, no additional mitigation measures are required to reduce school impacts of the proposed project to a less than significant level.

d. *Less Than Significant Impact* – The proposed project would develop a single-family subdivision with 210 residences that will generate a new demand for parks and recreation. The potential increase in population related to the TTM 20500 Project is about 735 persons. The City has an adopted standard of 3 acres of parkland for every 1,000 persons, as such the project would require an estimated additional 2.20 acres of parkland to accommodate the project. As such, the proposed project would contribute in-lieu fees assessed by the City's DIF program intended for City parks. Given that the City's General Plan deems the use of in-lieu fees as appropriate mitigation for parkland, it is anticipated that, through payment of any necessary in-lieu/DIF fees, which is considered a standard condition, the proposed project will have a less than significant impact to parks and recreation facilities.

e. *Less Than Significant Impact* – Other public facilities include library and general municipal services. The proposed project will incrementally add to the existing demand for other public services. The City assesses a facilities fee as part of the DIF program, to which the proposed project would be required to contribute. Payment of DIF is deemed adequate mitigation for the proposed project as it will offset future demand generated by potential new residents. Any impacts are considered less than significant and no additional mitigation is required.

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

SUBSTANTIATION

a. *Less Than Significant Impact* – As addressed in the discussion under XIV, Population and Housing, and XV(d) above, the proposed project would develop 210 single-family residences, and as such may induce limited population increase, though not substantially. As stated in the discussion under Population and Housing, an estimated 735 persons may reside at the new subdivision. There are four parks within about 2.5 miles of the project site—Mesa Linda Park, Eagle Ranch Park, Brentwood Park, and Liberty Park—and these parks provide a full range of park and recreation amenities. The proposed project would contribute in-lieu fees assessed by the City's DIF program intended for City parks and recreation. In addition, Lot G includes a small park for the local residents in addition to the adjacent water quality bioretention basin. Given that the City's General Plan deems the use of in-lieu fees as appropriate mitigation for parks and recreation, it is anticipated that, through payment of any necessary in-lieu/DIF fees, which is considered a standard condition, and the small internal park, the proposed project will have a less than significant impact to parks and recreation facilities. Furthermore, the proposed project will not generate a substantial increase in residents of the City who would substantially increase the use of existing recreational facilities. Therefore, any impacts under this issue are considered less than significant. No mitigation is required.

b. *Less Than Significant Impact* – The proposed project consists of 210 new single-family residences in the City of Victorville. The project does not include any recreational facilities. The site is mostly vacant with no existing recreational facilities on the project site and is designated for single-family residential use. As described throughout this Initial Study, the construction of the proposed TTM 20500 Project would not cause a significant adverse physical effect on the environment under any issue. No mitigation is required.

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

SUBSTANTIATION: Some of the information provided in this Section is abstracted from the following report: *"Victorville Residential Traffic Analysis"* prepared by Urban Crossroads dated February 9, 2023 and provided as Appendix 8a to this Initial Study. *"Victorville Residential Vehicle Miles Traveled (VMT) Analysis"* prepared by Urban Crossroads dated November 8, 2021 is provided as Appendix 8b.

CEQA Section 15064.3, subdivision (b):
(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

Background

Appendix 8a contains the following summary of potential impacts of the proposed project's traffic on the area circulation system. This detailed traffic study was prepared in consultation with City of Victorville staff and in accordance with the procedures and methodologies for assessing transportation impacts established

by the City. To assess the project's conformance with local operational standards, this study evaluates the project's effect on the area circulation system and, where necessary, identifies recommended improvements or corrective measures to alleviate operational deficiencies substantially caused or worsened by the proposed project. For compliance with the California Environmental Quality Act (CEQA) requirements, an assessment of the project's impacts in terms of vehicle miles traveled (VMT) is provided in Appendix 8b.

Project Description

The 60.6-acre project site is located at the southwest corner of Mesa Linda Avenue and Seneca Road in the City of Victorville. The currently vacant site is proposed to be developed with 210 single-family residential dwelling units. The project proposes one full access road from Mesa Linda Avenue, two full accesses to Seneca Road, and two full accesses to Begonia Road. For purposes of this analysis, the proposed project is anticipated to be constructed and fully operational by year 2023.

Project Trips

The proposed project is forecast to generate 1,982 daily trips with 147 AM peak hour trips and 197 PM Peak hour trips. Refer to Appendix 8a for a more detailed description of the project's trip generation characteristics. The evaluation of Level of Service (LOS) five future analysis scenarios:

- Existing
- Opening Year Cumulative (2023) Without Project Conditions
- Opening Year Cumulative (2023) With Project Conditions
- Future Year (2033) Without Project Conditions
- Future Year (2033) Without Project Conditions

Please refer to Appendix 8a for the detailed information regarding each of these scenarios. Also, refer to Table XVII-1 for a list of the intersections evaluated in the Traffic Analysis (TA).

Levels of Service

The study intersections currently operate within acceptable Levels of Service (D or better) during the peak hours for Existing Conditions, except Amethyst Road & Seneca Road – LOS F AM peak hour only.

The following study area intersection is anticipated to operate at an unacceptable LOS during one or more peak hours under Opening Year Cumulative (2023) Without Project traffic conditions; Amethyst Road & Seneca Road – LOS F AM peak hour only.

There are no additional study area intersections anticipated to operate at an unacceptable LOS with the addition of project traffic under Opening Year Cumulative (2023) With Project traffic, Amethyst Road & Seneca Road – LOS F AM peak hour only. However, the addition of the project traffic is anticipated to worsen the P< peak hour operations to LOS E.

The following study area intersections are anticipated to operate at an unacceptable LOS during one or more peak hours under Future Year (2033) Without Project traffic conditions: US-395 & Palmdale Road (SR-18), LOS F AM and PM peak hours; and Amethyst Road & Seneca Road, LOS F AM and PM peak hours.

There are no additional study area intersections anticipated to operate at an unacceptable LOS with the addition of project traffic under opening Year Cumulative (2023) With Project traffic conditions. Table XVII-2 provides a summary of environmental findings from the TA in Appendix 8a.

**Table XVII-1**
**INTERSECTION ANALYSIS LOCATIONS**

| ID | Intersections | Jurisdiction | CMP? |
|---|---|---|---|
| 1 | US-395 & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 2 | Driveway 1 & Seneca Rd. | Victorville | No |
| 3 | Driveway 2 & Begonia Rd. | Victorville | No |
| 4 | Cantina Rd. & Begonia Rd. | Victorville | No |
| 5 | Cantina Rd. & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 6 | Driveway 3 & Begonia Rd. | Victorville | No |
| 7 | Driveway 4 & Seneca Rd. | Victorville | No |
| 8 | Mesa Linda Av. & Driveway 5 | Victorville | No |
| 9 | Amethyst Rd. & Seneca Rd. | Victorville | No |
| 10 | Amethyst Rd. & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 11 | El Evado Rd. & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 12 | Amargosa Rd. & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 13 | I-15 SB Ramps & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 14 | Mariposa Rd./I-15 NB On-Ramp & Palmdale Rd. (SR-18) | Victorville, Caltrans | No |
| 15 | Mariposa Rd. & I-15 NB Ramps | Victorville, Caltrans | No |

Source: Urban Crossroads, Traffic Analysis Report dated January 6, 2022

**Table XVII-2**
**SUMMARY OF INTERSECTION LEVEL OF SERVICE BY ANALYSIS SCENARIOS**

| # | Intersection | Existing | | 2023 Without Project | | 2023 With Project | | 2033 Without Project | | 2033 With Project | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | AM | PM | AM | PM | AM | PM | AM | PM | AM | PM |
| 1 | US-395 & Palmdale Rd. (SR-18) | A - D | A - D | E | A - D | E | E | F | F | F | F |
| 2 | Driveway 1 & Seneca Rd. | N/A | N/A | N/A | N/A | A - D | A - D | N/A | N/A | A - D | A - D |
| 3 | Driveway 2 & Begonia Rd. | N/A | N/A | N/A | N/A | A - D | A - D | N/A | N/A | A - D | A - D |
| 4 | Cantina Rd. & Begonia Rd. | N/A | N/A | N/A | N/A | A - D | A - D | N/A | N/A | A - D | A - D |
| 5 | Cantina Rd. & Palmdale Rd. (SR-18) | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |
| 6 | Driveway 3 & Begonia Rd. | N/A | N/A | N/A | N/A | A - D | A - D | N/A | N/A | A - D | A - D |
| 7 | Driveway 4 & Seneca Rd. | N/A | N/A | N/A | N/A | A - D | A - D | N/A | N/A | A - D | A - D |
| 8 | Mesa Linda Av. & Driveway 5 | N/A | N/A | N/A | N/A | A - D | A - D | N/A | N/A | A - D | A - D |
| 9 | Amethyst Rd. & Seneca Rd. | F | A - D | F | A - D | F | A - D | F | F | F | F |
| 10 | Amethyst Rd. & Palmdale Rd. (SR-18) | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |
| 11 | El Evado Rd. & Palmdale Rd. (SR-18) | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |
| 12 | Amargosa Rd. & Palmdale Rd. (SR-18) | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |
| 13 | I-15 SB Ramps & Palmdale Rd. (SR-18) | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |
| 14 | Mariposa Rd./I-15 NB On-Ramp & Palmdale Rd. (SR-18) | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |
| 15 | Mariposa Rd. & I-15 NB Ramps | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D | A - D |

A - D = A - D
E = E
F = F

Source: Urban Crossroads, Traffic Analysis Report dated January 6, 2022

The circulation system improvements required to mitigate site access and site adjacent improvements are summarized in the mitigation measures provided below.

a. *Less Than Significant With Mitigation Incorporated* – The Project consists of 210 single-family residential units that will generate an estimated 1,982 trips per day. The trip generation for the proposed project was compiled using the Institute of Transportation Engineers Trip Generation Manual (11th Edition). The proposed Project is forecast to generate total 147 AM peak hour trips, 197 total PM peak hour trips. Refer to Appendix 8a and for the detailed trip generation forecast. Based on the Traffic Impact Analysis (TIA), the proposed Project will contribute to a single intersection exceeding the City's circulation system significance threshold. Thus, the proposed Project will require mitigation to reduce potentially significant impacts to a less than significant level. The following mitigation measure shall be implemented by the proposed project.

***TRAN-1*** ***The project offsite improvements and fair share calculation is based on the proportion of project peak hour intersection turning movement volumes contributed to the specific improvement locations relative to the total new peak hour intersection turning movement volume forecast for Years (2023 and 2033) With Project conditions. The developer shall pay the project's fair share percentage of the identified impacted intersection costs identified in the approved traffic study "Victorville Residential Traffic Analysis"*** **prepared by Urban Crossroads*****. This fee shall be paid prior to occupancy of the subdivision.***

With implementation of the preceding mitigation measure, the proposed project would have a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b. *Less Than Significant Impact* – Senate Bill 743 mandates that California Environmental Quality Act (CEQA) guidelines be amended to provide an alternative to Level of Service for evaluating transportation impacts. The amended CEQA guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Traveled (VMT) for transportation impact evaluation. For the purposes of this analysis the recommended VMT analysis methodology and thresholds identified within the Technical Advisory and the City's new analysis methodology have been used.

The City TIA Guidelines for VMT evaluation specify the following three screening steps: (1) Low VMT Area screening; (2) Daily Trip Screening; and (3) Land Use Type Screening. The VMT analysis determined that the proposed project does not meet any of the City's adopted screening criteria. Therefore, a project generated VMT screening analysis was performed

Results of this VMT analysis determined that the Project has a less than significant VMT impact for the projected VMT per Service Population (SP) when compared to the City's adopted impact threshold (i.e., better than the City's General Plan buildout VMT per SP. No mitigation is required.

c. *Less Than Significant Impact* – Design of driveways, internal roadways, intersections and external roadways will be based on City Code, which sets the standard for such design. As such the Project will construct the project access roadways in accordance with mitigation measure **TRAN-1** and the City approved project traffic study. Based on these direct project design improvements in the circulation system, it is not anticipated that any traffic hazards will increase. As such, the Project development would have a less than significant potential to increase hazards due to geometric design features or incompatible uses.

*d.* *Less Than Significant With Mitigation Incorporated* – The proposed project will include roadway construction on surrounding roadways as outlined in MM **TRAN-1** and the approved traffic study. Such construction can negatively impact emergency access to the project site. To mitigate this potential effect on emergency access, mitigation measures **TRAN-2** and **TRAN 3** shall be implemented.

***TRAN-2*** ***The City shall mandate that the Applicant require their contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:***

- ***Develop circulation and detour plans, if necessary, to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.***
- ***To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.***
- ***Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.***
- ***For roadways requiring lane closures that would result in a single open lane, maintain alternate one-way traffic flow and utilize flagger-controls.***
- ***Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.***

***TRAN-3*** ***The City shall require that all disturbances to public roadways be repaired in a manner that complies with the Standard Specifications for Public Works Construction (green book) or other applicable City of Victorville standard design requirements.***

Upon implementation of a construction traffic management plan, any potential conflict with emergency access will be considered reduced to a less than significant impact in the short term, i.e., project construction. Thus, any impacts are considered less than significant with implementation of mitigation. No additional mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|---|---|---|---|
| **XVIII. TRIBAL CULTURAL RESOURCES:** Would the project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is: | | | | |
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☒ | ☐ | ☐ |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in sub-division (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☒ | ☐ | ☐ |

SUBSTANTIATION

a&b. To initiate AB 52 consultation with Native American tribes, the City of Victorville notified pertinent tribes about TTM 20500 and received comments from the Yuhaaviatim of San Manuel Nation in November 2022. An e-mail was transmitted from Ryan Nordness (Yuhaaviatim Cultural Resources Management Department) to the City acknowledging that the project site is within Serrano ancestral territory. Based on the nature and location of the proposed project, and "given the CRM Department's present state of knowledge, the Yuhaaviatim does not have any specific concerns with the project at this time. The Tribe requested the following contingency mitigation measures be included in this Tribal Cultural Resources section. Note that additional mitigation measures are included in the Cultural Resources section of this document.

***TCR-1*** ***The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan will allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.***

***TCR-2*** ***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 applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.***

Upon implementation of the preceding mitigation measures and the Cultural Resource measures, potential TCR impacts will be considered reduced to a less than significant impact. Thus, any impacts are considered less than significant with implementation of mitigation.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|---|---|---|---|
| **XIX. UTILITIES AND SERVICE SYSTEMS**: Would the project: | | | | |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | ☐ | ☐ | ☒ | ☐ |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | ☐ | ☐ | ☒ | ☐ |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | ☐ | ☐ | ☒ | ☐ |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |

SUBSTANTIATION

a. Water

*Less Than Significant Impact* – The City of Victorville Water District (VWD) is responsible for the water supply to the City. Water service is available through a connection located adjacent to the project site. As previously stated under issue X, Hydrology and Water Quality, VWD's 2015 UWMP identifies sufficient water resources to meet demand in its service area. The anticipated water supply within VWD's retail service area is anticipated to be greater than the demand for water in the future, which indicates that VWD has available capacity to serve the proposed project. Therefore, development of the TTM 20500 Project would not result in a significant environmental effect related to the relocation or construction of new or expanded water facilities. Impacts are considered less than significant.

Wastewater

*Less Than Significant Impact* – Wastewater collection will be provided by the City with VVWRA providing wastewater treatment. VVWRA treats about 10.7 MDG[10], and recycles millions of gallons per day.[11] The WTP has a residual capacity of 3.3 MGD. Based on the Victorville Sewer Master Plan, based on the 210 units the proposed project is anticipated to generate 37,800 gallons of wastewater

[10] https://www.vvwra.com/about_us/welcome/default.htm
[11] https://www.vvwra.com/edu_resources/rep.htm

per day (GPD), or about 1.1% of the available residual treatment capacity at the VVWRA WTP. The project would connect to the City's existing wastewater collection system within the nearest roadway, and would install an internal wastewater collection system to collect sewage generated by residences, the development of which is not anticipated to cause a significant impact. Therefore, development of the TTM 20500 Project would not result in a significant environmental effect related to the relocation or construction of new or expanded wastewater facilities. Impacts are less than significant.

Stormwater

*Less Than Significant Impact* – The surface runoff from the site, nonpoint source storm water runoff, will be managed in accordance with the WQMP (see Appendix 7) as discussed in the Hydrology and Water Quality Section (Section X) of this Initial Study. The onsite drainage system will capture the incremental increase in runoff from the project site associated with project development. The development of the project site will require incorporation of two bioretention basins to prevent runoff from leaving the project site or otherwise pretreat the runoff before leaving the site to meet City and County of San Bernardino requirements. Therefore, surface water will be adequately managed on site and as such, development of the TTM 20500 Project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power

*Less Than Significant Impact* – Southern California Edison (SCE) provides electricity to the City, and will support the electricity required to support the occupants of the 210 single-family residences. The effort to connect to the existing electrical system, and to install electricity connections within the project site to serve future residents of the TTM 20500 with electricity is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. Therefore, development of the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded electric power facilities. Impacts are less than significant.

Natural Gas

*Less Than Significant Impact* – Natural gas will be supplied by Southwest Gas. The site will connect to the existing natural gas line adjacent to the project site within Mesa Linda Drive. The effort to connect to the existing gas line within the adjacent roadway, and to install natural gas lines within the project site to serve future residents of the proposed project with natural gas is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. Therefore, development of the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. Impacts are less than significant.

Telecommunications

*Less Than Significant Impact* – Development of TTM 20500 would require a connection to telecommunication services, such as wireless internet service and phone service. This can be accomplished through connection to existing services that are available to the developer at the project site. Therefore, development of the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunications facilities. Impacts are less than significant.

b. *Less Than Significant Impact* – Please refer to the discussion under Hydrology and Water Quality above. In 2015 the total available water supply for retail customers, was 21,454 AF, while the demand was 20,843 AF. VWD anticipates that the projected water demand for Single-Family uses within the VWD retail service area for 2025 is 18,291 AFY, and for 2040 is 23,867 AFY, while the overall available water supply is anticipated to be 32,627 AFY in 2025 (5,860 AF above overall demand), and 40,788 AFY in 2040 (5,860 AF above overall demand). The proposed project is a single-family residential subdivision project consisting of 210 units, accommodating an estimated 767 residents, and given that the City assumes a potable water use of 202 GPD per capita, the demand for potable water by the proposed project is anticipated to be 154,934 GPD, equivalent to 173.7 AFY. Based on

the projected water demand for single-family uses within the VWD retail service area for 2025, and for 2040, it is anticipated that the 173.7 AFY demand can be accommodated into the future. Based on these substantiating data, provision of domestic water supply can be accomplished without causing significant impacts on the existing water system or existing entitlements. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Impacts under this issue are considered less than significant.

c. *Less Than Significant Impact* – New development in the City is required to install wastewater infrastructure concurrent with project development. All wastewater generated by the interior plumbing system of the proposed project would be discharged into the local sewer main and conveyed for treatment through VVWRA. VVWRA owns and operates a WTP, which currently treats an average of 10.7 MGD and recycles millions of gallons per day. The WTP has a residual capacity of 3.3 MGD. As stated under issue XIX(a), above, the proposed project is anticipated to generate 37,800 GPD of wastewater, or about 1.2% of the available treatment capacity at the VVWRA WTP. Given that the VVWRA WTP can treat a maximum of 14 MGD, and currently treats an average of 10.7 MGD, there is ample capacity available to accommodate the wastewater that would be generated as a result of the proposed project. As such, it is anticipated that there will be available capacity to accommodate the demand generated by the proposed project. Impacts under this issue are less than significant.

d&e. *Less Than Significant Impact* – The proposed project will generate demand for solid waste service system capacity and has a potential to contribute to potentially significant cumulative demand impacts on the solid waste system. Solid waste generation rates of residential uses such as that which this project proposes can produce 12.23 pounds of refuse per household per day. It is estimated that 210 units would generate about 2,568.3 pounds per day or 468.7 tons per year. Solid waste capacity has been expanded to provide adequate disposal capacity for cumulative demand over at least the next five years. Combined with the City's mandatory source reduction and recycling program, the proposed project is not forecast to cause a significant adverse impact to the solid waste disposal system due to the available capacities at nearby landfills.

The nearest landfill is the Victorville Sanitary Landfill. According to the CalRecycle, the maximum permitted capacity of Victorville Sanitary Landfill is 83,200,000 Cubic Yards (CY), while its remaining capacity is 81,510,000 CY; the Victorville Sanitary Landfill can accept 3,000 tons per day. Additionally, the Victor Valley Materials Recovery Facility (MRF), located in Victorville at 17000 Abbey Lane, serves the City by reducing waste in order to comply with the requirements of state law AB 939 which mandates a 50% reduction in the amount of waste sent to landfill by the year 2000 and beyond.

Trash and recycling service is mandatory for all occupied premises in the City of Victorville, and the City's trash and recycling service will serve the proposed single-family residences. It is not anticipated that the project will generate a significant amount of construction waste, as the project aims to use any excavated material on site, with a neutral amount of cut and fill. However, should the proposed project need to remove any excess soils, the soil removal will be accomplished using trucks during normal working hours, with a maximum of 50 round trips per day. Construction would not require demolition of any structures, though it would require vegetation removal (clearing and grubbing) which will be removed and transported to a green waste collection facility. Furthermore, any hazardous materials collected on the project site during either construction of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Therefore, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. The project is expected to comply with all regulations related to solid waste under federal, state, and local statutes and be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. No mitigation is necessary.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|---|---|---|---|
| **XX. WILDFIRE:** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire? | ☐ | ☐ | ☐ | ☒ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | ☐ | ☐ | ☐ | ☒ |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☐ | ☒ |

SUBSTANTIATION

a-d. *No Impact* – The proposed project (TTM 20500) is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone, therefore the proposed project can have no impacts to any wildfire issues. According to the San Bernardino County Land Use Plan General Plan Hazard Overlays (Figure IX-3), there are no fire safety overlay districts delineated by the County. Furthermore, according to CALFIRE, there are no fire hazard zones within the City of Victorville that are of state responsibility (Figure IX-5). The project area is located within an area with very little fuel load in the surrounding area that could be susceptible to wildfires and is located within an area removed from the high fire hazard areas that are located adjacent to the San Bernardino Mountains about 15 miles to the south of the project site. As such, no adverse impacts under these issues are anticipated.

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

SUBSTANTIATION

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

a. *Less Than Significant With Mitigation Incorporated* – The project has a potential to cause a significant impact any biological or cultural resources. The project has been identified as having a potential to degrade the quality of the natural environment, substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project requires mitigation for biological resources to prevent significant impacts from occurring as a result of implementation of the project. Mitigation to address the potentially sensitive cultural resources is required, but will ensure that these sensitive resources are protected and will not be adversely impacted by the proposed project. Additionally, because it is not known what could be unearthed upon any excavation activities, contingency mitigation measures are provided to ensure that, in the unlikely event that any resources are found, they are protected from any potential impacts. Please see biological and cultural sections of this Initial Study.

b. *Less Than Significant With Mitigation Incorporated* – The project has nine potential impact categories that are individually limited, but may be cumulatively considerable. These are: Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. Cumulative traffic, air quality, etc. impacts are considered as part of the analysis contained under the related impact category. These above issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no

unavoidable significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, less than significant impacts.

c. *Less Than Significant With Mitigation Incorporated* – The proposed project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Air Quality, Geology and Soils, Hazards & Hazardous Materials, Hydrology and Water Quality, and Noise require the implementation of mitigation measures to reduce human impacts to a less than significant level. Wildfire does not require mitigation at the project location. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

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

Based on the evidence and findings in this Initial Study, the City of Victorville proposes to adopt a Mitigated Negative Declaration for the TTM 20500 Project. A Notice of Intent to Adopt a Mitigation Negative Declaration (NOI) will be issued for this project by the City. The Initial Study and NOI will be circulated for 30 days of public comment. At the end of the 30-day review period, a final MND package will be prepared and it will be reviewed by the City for possible adoption at a future Planning Commission meeting, the date for which has yet to be determined. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

_____

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

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

## SUMMARY OF MITIGATION MEASURES

### Air Quality

AQ-1 Fugitive Dust Control. The following measures shall be incorporated into Project plans and specifications for implementation:

- Apply soil stabilizers or moisten inactive areas.
- Water exposed surfaces to avoid visible dust leaving the construction site (at least 2-3 times/day).
- Cover all stock piles with tarps at the end of each day and as needed during the construction day.
- Provide water spray during loading and unloading of earthen materials.
- Require the contractor to minimize in-out traffic from construction zone to the extent feasible, and enforce a speed limit of 15 MPH on site to avoid dust migration from the site.
- Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard.
- Sweep streets daily if visible soil material is carried out from the construction site.

AQ-2 Exhaust Emissions Control. The following measures shall be incorporated into Project plans and specifications for implementation:

- Utilize off-road construction equipment that has met or exceeded the maker's recommendations for vehicle/equipment maintenance schedule.
- Contactors shall utilize Tier 4 or better heavy equipment.
- Enforce 5-minute idling limits for both on-road trucks and off-road equipment.

### Biological Resources

BIO-1 A qualified biologist shall develop a Worker Environmental Awareness Program (WEAP) that would include information on general and special status species within the project area, identification of these species and their habitats, techniques being implemented during construction to avoid impacts to species, consequences of killing or injuring an individual of a listed species, and reporting procedures when encountering listed or sensitive species. All construction crews, foremen, and other project personnel potentially working on site should attend this education program prior to the first day of work.

BIO-2 BUOW would be included as one of the species covered in the WEAP that all construction crews, foremen, and other project personnel potentially working on site should attend prior to the first day of work.

Preconstruction presence/absence surveys for burrowing owl shall be conducted no less than 3 days prior to any onsite ground disturbing activity by a qualified biologist, including prior to each phase of new ground disturbance. The burrowing owl surveys shall be conducted pursuant to the recommendations and guidelines established by the California Department of Fish and Wildlife in the "California Department of Fish and Wildlife 2012 Staff Report on Burrowing Owl Mitigation." In the event this species is not identified within the project limits, no further mitigation is required, and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to commencement of project activities. If during the preconstruction survey, the burrowing owl is found to occupy the site, Mitigation Measure BIO-3 shall be required.

BIO-3 If burrowing owls are identified during the survey period, the Developer, in conjunction with the City, shall take the following actions to offset impacts prior to ground disturbance:

The Developer, in conjunction with the City shall notify CDFW within three business days of determining that a burrowing owl is occupying the site to discuss the observed location, activities and behavior of the burrowing owl(s) and appropriate avoidance and minimization measures.

Active nests within the areas scheduled for disturbance or degradation shall be avoided until fledging has occurred, as confirmed by a qualified biologist. Following fledging, owls may be passively relocated by a qualified biologist, as described below.

If impacts on occupied burrows are unavoidable, onsite passive relocation techniques may be used if approved by the CDFW to encourage owls to move to alternative burrows provided by the Developer outside of the impact area.

If relocation of the owls is approved for the site by CDFW, CDFW shall require the Developer to hire a qualified biologist to prepare a plan for relocating the owls to a suitable site and conduct an impact assessment. A qualified biologist shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) to the CDFW for review/approval prior to the commencement of disturbance activities onsite.

The relocation plan must include all of the following and as indicated in Appendix E:

- The location of the nest and owls proposed for relocation.
- The location of the proposed relocation site.
- The number of owls involved and the time of year when the relocation is proposed to take place.
- The name and credentials of the biologist who will be retained to supervise the relocation.
- The proposed method of capture and transport for the owls to the new site.
- A description of site preparation at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one-time or long-term vegetation control).

The Developer shall conduct an impact assessment, in accordance with the Staff Report on Burrowing Owl Mitigation prior to commencing project activities to determine appropriate mitigation, including the acquisition and conservation of occupied replacement habitat at no less than a 2:1 ratio.

Prior to passive relocation, suitable replacement burrows site(s) shall be provided at a ratio of 2:1 and permanent conservation and management of burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owl impacts are replaced consistent with the Staff Report on Burrowing Owl Mitigation including its Appendix A within designated adjacent conserved lands identified through coordination with CDFW and the City. A qualified biologist shall confirm the natural or artificial burrows on the conservation lands are suitable for use by the owls. Monitoring and management of the replacement burrow site(s) shall be conducted and a reporting plan shall be prepared. The objective shall be to manage the replacement burrow sites for the benefit of burrowing owls (e.g., minimizing weed cover), with the specific goal of maintaining the functionality of the burrows for a minimum of 2 years.

A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.

BIO-4 Although no desert tortoises were detected during the site surveys, habitat within the project footprint is considered marginally suitable for this species. Therefore, a qualified biologist shall conduct a pre-construction clearance survey no more than 14 days prior to initiating construction in accordance with U.S. Fish and Wildlife Service's (2019) survey protocol; if the biologist detects a desert tortoise, the biologist or applicant will contact the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife immediately.

BIO-5 Prior to construction, a preconstruction survey shall be conducted by a qualified biologist to verify the location or locations of Joshua Trees on site. The qualified biologist, preferrably a Desert Native Plant Specialist, shall prepare a report that shall be submitted to the City that shall identify and provide: a) the GPS coordinates and accompanying map of each WJT within the project area; b) the age class of each WJT; c) the number of clonal WJT associated with each parent plant and the methodology used to make this determination; d) a unique numbering system for each WJT, and e) geo-referenced, representative photos of parent trees, clones, and general distribution of WJT across the project site. The report shall show the location of the proposed grading/construction and all existing western Joshua trees with photos showing all western Joshua trees in relation to the proposed grading/construction. The report shall include findings and avoidance or mitigation recommendations in conformance with the WJTCA after consultation with the California Department of Fish and Game.

A biological monitor shall be present for all construction-related activities and shall ensure that any required buffers are maintained for the duration of construction, such that any direct or indirect impacts to any western Joshua trees are consisent with the agreement negotiated under the WJTCA.

BIO-6 If the bird nesting season cannot be avoided, nesting bird surveys shall be conducted by a qualified avian biologist no more than three (3) days prior to vegetation clearing or ground disturbance activities. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the preconstruction nesting bird surveys, a Nesting Bird Plan (NBP) shall be prepared and implemented by the qualified avian biologist. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, ongoing monitoring, establishment of avoidance and minimization measures, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, individual/pair's behavior, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. To avoid impacts to nesting birds, any grubbing or vegetation removal should occur outside peak breeding season (typically February 1 through September 1).

**Cultural Resources**

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

CUL-2 In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

CUL-3 If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

CUL-4 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 para. 7050.5 and that code enforced for the duration of the project.

**Geology and Soils**

GEO-1 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. Where covering is not possible, measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.

GEO-2 Excavated areas shall be backfilled and compacted such that erosion does not occur. Paved areas disturbed by this project shall be repaved in such a manner that roadways and other disturbed areas are returned to the pre-project conditions or better.

GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) will be sprayed with water or soil binders twice a day or more frequently if fugitive dust is observed migrating from parcel where the Project is being installed.

GEO-4 The length of trench which can be left open at any given time will be limited to that needed to reasonably perform construction activities. This will serve to reduce the amount of backfill stored onsite at any given time.

GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

**Hazards and Hazardous Materials**

HAZ-1 All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

**Noise**

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

NOI-2 Noise minimizing measures shall be implemented to reduce noise levels to the greatest extent feasible at the nearest receptors, defined as at or below 55 dBA permitted between the hours of 10:00 PM and 7:00 AM; and at or below 65 dBA permitted between the hours of 7:00 AM and 10:00 PM.

NOI-3 Equipment not in use for five minutes shall be shut off.

NOI-4 Equipment shall be maintained and operated such that loads are secured from rattling or banging.

**Transportation**

TRAN-1 The project offsite improvements and fair share calculation is based on the proportion of project peak hour intersection turning movement volumes contributed to the specific improvement locations relative to the total new peak hour intersection turning movement volume forecast for Years (2023 and 2033) With Project conditions. The developer shall pay the project's fair share percentage of the identified impacted intersection costs identified in the approved traffic study "Victorville Residential Traffic Analysis" prepared by Urban Crossroads. This fee shall be paid prior to occupancy of the subdivision.

TRAN-2 The City shall mandate that the Applicant require their contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans, if necessary, to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
- For roadways requiring lane closures that would result in a single open lane, maintain alternate one-way traffic flow and utilize flagger-controls.
- Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

TRAN-3 The City shall require that all disturbances to public roadways be repaired in a manner that complies with the Standard Specifications for Public Works Construction (green book) or other applicable City of Victorville standard design requirements.

**Tribal Cultural Resources**

TCR-1 The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan will allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

TCR-2 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 applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

## REFERENCES

CRM TECH, *"Historical/Archaeological Resources Survey Report, Tentative Tract Map #20500, City of Victorville, San Bernardino County, California"* dated October 4, 2022

Jacobs, *"Biological Resources Assessment and Focused Desert Tortoise Survey for 60-Acre 219-Lot Development Project on APN #3103-551-05"* (BRA) dated September 2022

LOR Geotechnical Group, Inc., *"Phase I Environmental Site Assessment Tentative Tract Map 16681 APN 3103-551-05 SWC Seneca Road and Mesa Linda Avenue, City of Victorville, San Bernardino County, California"* dated December 6, 2021

LOR Geotechnical Group, Inc., *"Preliminary Geotechnical Investigation Tentative Tract 16681 Victorville, California"* dated December 22, 2021, revised March 20, 2023

Ludwig Engineering Associates, Inc., *"Mojave River Watershed Water Quality Management Plan For: Tract 20500"* dated February 11, 2022

Urban Crossroads, *"Victorville Residential, Air Quality Impact Analysis, City of Victorville"* dated November 16, 2021

Urban Crossroads, *"Victorville Residential Greenhouse Gas Analysis, City of Victorville"* October 23, 2023

Urban Crossroads, *"Victorville Residential Traffic Analysis"* dated February 9, 2023

Urban Crossroads, *"Victorville Residential Vehicle Miles Traveled (VMT) Analysis"* dated November 8, 2021

### Websites

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http://www.mojavewater.org/files/25AR1718_Revised.pdf
https://www.scag.ca.gov/Documents/Victorville.pdf
http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf
http://www.scag.ca.gov/Documents/5thCyclePFinalRHNAplan.pdf;
https://www.vvwra.com/about_us/welcome/default.htm
https://www.vvwra.com/edu_resources/rep.htm

# FIGURES

# APPENDIX 1
# AIR QUALITY

# APPENDIX 2
# BIOLOGICAL RESOURCES ASSESSMENT

# APPENDIX 3
# CULTURAL RESOURCES SURVEY

# APPENDIX 4
# GEOTECHNICAL REPORT

# APPENDIX 5
# GREENHOUSE GAS ANALYSIS

# APPENDIX 6
# PHASE I ESA

# APPENDIX 7
# WQMP

# APPENDIX 8a
# TRAFFIC ANALYSIS

# APPENDIX 8b
# VMT ANALYSIS